

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MICHAEL GRYNICK, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

FCA US LLC,

Defendant,

Civil Action No. **1:24-cv-01324-JLH-SRF**

**FIRST AMENDED CLASS ACTION
COMPLAINT**

JURY TRIAL DEMANDED

INTRODUCTION

1. Plaintiff Michael Grynicky ("Plaintiff") brings this action individually and on behalf of all persons in the State of California who purchased or leased 2011 or newer Chrysler, Dodge, Jeep, or RAM-branded vehicle equipped with the 3.6L Pentastar V6 Classic engine¹ ("Class Vehicles") against Defendant FCA US LLC ("Defendant" or "FCA"). The allegations herein are based on personal knowledge as to Plaintiff's own conduct and are made as to other matters based on an investigation by counsel, including an analysis of publicly available information evaluated by Plaintiff's retained expert.

2. This is a consumer class action concerning the misrepresentation of material facts, the failure to disclose material facts, and safety concerns to consumers.

3. Defendant manufactured, marketed, distributed, and sold the Class Vehicles without disclosing that the Class Vehicles possessed a defective valvetrain that materially affects the ability of the vehicles to operate as intended and provide safe, reliable transportation. FCA equipped these

¹ These vehicles include but are not limited to: 2014-2016 Chrysler Town & Country; 2014-2015, 2017 Dodge Journey; 2014-2016 Dodge Challenger; 2014-2016 Dodge Charger; 2014-2015 Dodge Durango; 2014-2017 Dodge Grand Caravan; 2014-2015 Jeep Grand Cherokee; 2014-2016 Chrysler 300; 2014-2017 Jeep Wrangler; 2014-2016 Chrysler 200; 2014-2017 Ram 1500; 2014-2017 Ram Promaster; and 2014 Dodge Avenger.

vehicles with the 3.6L Pentastar Classic V6 engine, knowing that it suffered from a defective valvetrain, and falsely marketed the vehicles as safe to drive, durable, reliable, and capable of providing transportation.

4. The Class Vehicles are equipped with the 3.6L Pentastar Classic V6 Engine (the “Engine”). The Engine suffers from a defective valvetrain design that leads to premature failure of components of its valvetrain, including, without limitation, the Roller Finger Followers (“RFF” also referred to as “Rocker Arms”), camshaft, and the Hydraulic Lash Adjusters (“HLA” or “lifters”)(the “Defect”). In particular, the RFF and its internal components are too small and cannot withstand the mechanical load and heat produced by the Engine, causing these and other valve train components to fail or prematurely wear far before the intended useful life of the components. As a result, the defective valvetrain cannot adequately, properly and timely transfer the motion of the cam lobes to open and close the valves to effectuate proper internal combustion. As these parts fail, the valvetrain no longer operates to effectively permit the intake of air and fuel and the exhaust of combustion by-products, resulting in engine misfires.

5. The Defect may cause an audible ticking noise from the engine, engine misfires often resulting in bucking and surging, decreased engine performance, decreased fuel economy, premature failure of valvetrain components, degradation in engine performance, early failure or destruction of camshaft and other valvetrain components, and may require a full cylinder head replacement. If left unaddressed, the Defect can cause catastrophic engine failure. Additionally, metal particles and debris from the worn RFF, and related components, may contaminate the engine oil and circulate throughout the engine, damaging vital components and the engine at-large.

6. Despite FCA’s knowledge, at least as early as 2013, of the existence and severity of the Defect, it touted the quality, durability, reliability, and performance of the Class Vehicles via its public statements and multimedia marketing campaigns. FCA also advertised that the Engine was of high quality, with exceptional performance and comparatively low cost of ownership.

7. The Defect is the result of under-designed valvetrain in the 3.6L Pentastar Classic V-6 engine.

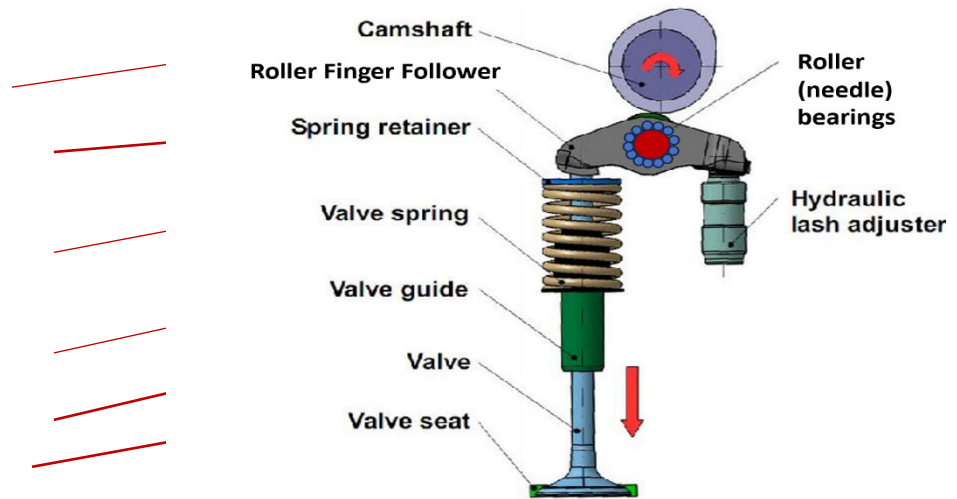


Figure 1

In particular, the needle bearings in the RFF lack the diameter to bear the mechanical load of the Engine, causing the bearings to wear prematurely and the RFF to fail. The Defect causes unsafe driving conditions because the Class Vehicles have a significant chance of failing while being driven. Further, even the lesser symptoms of the Defect affect vehicle performance and safety, making it harder for a driver to control the vehicle as it loses power, hesitates, or misfires.

8. The Defect is inherent in each Class Vehicle and was present at the time of sale or lease to each Class Member. Each of the Engines installed in the Class Vehicles is identical or substantially similar, in that FCA made no material changes to the design of the Pentastar Classic engine over the years.

9. Discovery will show that FCA never approved and implemented a repair that would fully address the Defect. Instead, it deployed *Band-Aid fixes* that worked only to delay the failure of the component parts until the Class Vehicles were outside the warranty period—passing the cost of the repair onto the consumer. Rather than fixing the 3.6L Pentastar Classic V-6 engine, FCA designed an entirely new engine, the 3.6L Pentastar Upgrade V-6 engine, which addressed the design defects with the Pentastar Classic engine valvetrain. However, even as FCA phased the upgraded engine into production and into the market in certain FCA vehicles, FCA continued to produce and sell Class Vehicles with the 3.6L Pentastar Classic V6 engine without disclosing the Defect to consumers.

10. The Defect not only causes unsafe driving conditions, but also causes internal damage to other engine components, notably the camshaft and the Hydraulic Lash Adjusters (also referred to as lifters)². Discovery will show that FCA has no approved repair for the Defect and merely replaces defective parts with equally defective parts and therefore consumers are often faced with repeated repairs because the replacement parts do not cure the Defect. Further, many repair attempts may leave damage to other engine components unaddressed, leading to cumulative harmful effects which undermine the expected life of the Engine even when repairs are made before complete engine failure.

11. Replacing the RFF, camshaft and associated valvetrain components can cost from \$712.70 to \$1,939.10, while it can cost more than \$9,000 for a new engine. Knowing that there is

² Hydraulic Lash Adjusters (“HLA”) and lifters are used interchangeably from time to time.

no permanent repair for the Defect, FCA directs its authorized dealerships to merely replace certain parts with equally defective parts, while informing consumers that their vehicles are fixed, including when repairs were made under warranty. In this matter, FCA has purposefully concealed the existence and extent of the Defect, in order to transfer the costs of repairs from itself to unsuspecting consumers.

12. The Defect not only decreases the value of the Class Vehicles, because there is no permanent repair, it can endanger drivers and passengers in the vehicles. For example, when the vehicles suddenly lose power, drivers will be unable to maintain speed on highways or other roadways, become stranded on roadways, or have difficulty crossing intersections, leading to an increased chance of collision. The Defect also creates uncertainty for the owners and lessees of the Class Vehicles, who cannot rely on their vehicles to operate safely or reliably, even after repairs have been performed.

13. Despite knowing that the Class Vehicles are equipped with engines that suffer from a design defect that causes the valvetrain system to prematurely fail well before its useful and expected life, while also damaging internal engine components, FCA failed to disclose such information about the Defect to the public and failed to offer a permanent remedy for the Defect. Rather, FCA represented that the Engines installed in Class Vehicles were of high-quality and reliable, as well as sufficient for the intended use of the vehicles. FCA's deliberate non-disclosure and omission of these defects artificially inflated the purchase and lease price for these vehicles. Had FCA disclosed the Defect, Plaintiff and the Class members would not have purchased their vehicles or would have paid less for them.

14. When an automobile manufacturer sells a car, it has a duty under federal law to ensure that the car functions properly and safely and is free from material defects which undermine the ability of the vehicle to provide safe, reliable transportation. Federal law requires that when an automobile manufacturer discovers a safety defect, it must disclose the defect and remedy the problem or cease selling the car. Further, when a company provides a warranty, it must honor that warranty. FCA deceived its customers when it promised to stand by the warranty it issued to purchasers when it had no intent to do so, when it failed to honor the warranties by providing only illusory repairs, when it

sold vehicles that were not capable of providing safe, reliable transportation, and when it failed to disclose a safety defect in the Class Vehicles.

15. Plaintiff and members of the Classes reasonably expected that FCA's representations that the Class Vehicles were properly engineered and equipped to handle ordinary, public road driving would be true and complete and would not omit material information. However, Defendant concealed and failed to disclose to Plaintiff and members of the Classes that the Defect exists in the Class Vehicles and that there is a significant safety risk when the Class Vehicles suddenly misfire, hesitate, buck, surge, or lose power while being driven. Moreover, Defendant concealed that, as a result of the Defect, the Class Vehicles will require significant, costly repairs.

16. Based on pre-production testing; design failure mode analysis; warranty claims; replacement part orders; ongoing communications with its suppliers and dealers regarding defective parts; consumer complaints, including complaints to NHTSA; and investigations and testing done in response to those complaints, as well as other sources of internal data not available to consumers, Defendant was aware of the Defect in the Class Vehicles but concealed the Defect from Plaintiff and members of the Classes. Indeed, despite being aware of the Defect and numerous complaints, FCA knowingly, actively and affirmatively omitted and/or concealed the existence of the Defect to increase profits by selling additional Class Vehicles and by unlawfully transferring the cost of repair and replacement of the valvetrain and other damaged associated parts to Plaintiff and members of the Class.

17. FCA had exclusive knowledge of the defective design of the 3.6L Pentastar Classic V6 valvetrain which was material to Plaintiff and Class Members, who could not reasonably know of the Defect. FCA has not disclosed the Defect to the purchasers or lessees, like Plaintiff, at the point of purchase or through advertisements or marketing materials. Such full and complete disclosures would have influenced Class Members' purchase decisions and the purchase price they paid. The undisclosed Defect also diminished the resale of the Class Vehicles. Under all circumstances, FCA had a duty to disclose the latent Defect at the point of sale of the Class Vehicles. Instead, FCA failed and refused—and continues to refuse—to disclose the Defect and provide a meaningful remedy to those who have suffered economic harm as a result of the Defect. Worse, FCA has denied warranty

coverage to consumers with vehicles that are still covered by warranty for this Defect, particularly in refusing to replace all the components damaged by defective RFF and other valvetrain components.

18. The Defect presents a safety risk to drivers and passengers, causes damages to valvetrain and ancillary components over time, and makes vehicles equipped with the defective Engines imminently dangerous, as the Engine may fail while the vehicle is in motion. It makes the Class Vehicles unfit for the ordinary and advertised use of providing safe and reliable transportation. As such, the Defect presents a breach of the implied warranty of merchantability.

19. Additionally, because FCA concealed and failed to disclose the Defect, owners have suffered and continue to suffer substantial damages and should be entitled to the benefits of all tolling and estoppel doctrines.

20. As a direct and proximate result of FCA's concealment of, and failure to disclose, the Defect, Plaintiff and Class members: (1) overpaid for the Class Vehicles because the undisclosed Defect inflated the market price; (2) have Vehicles that have significantly diminished resale value; (3) have Vehicles that suffer premature failure of valvetrain components, including Roller Finger Followers, HLAs, and camshafts, as well as catastrophic failures of the engine; (4) have and/or must expend significant money to have their Vehicles (inadequately) repaired; and (5) are not able to use their Vehicles for their intended purpose and in the manner FCA advertised.

21. FCA breached the implied warranty through which FCA promised to, *inter alia*, provide Class Vehicles fit for the ordinary and advertised purpose for which they were sold. Because the Defect was present at the time of sale or lease of the Class Vehicles and concealed from Plaintiff and members of the Class, FCA, was required to repair or replace the Engine. Despite this, FCA has failed to repair or replace the defective and damaged parts, free of charge.

22. FCA's decision to sell the Class Vehicles without disclosing its specialized knowledge of the Defect also violates a number of consumer state laws.

23. Plaintiff and Class members have purchased and leased Class Vehicles that they would not otherwise have purchased or leased, or would have paid less for, had they known of the Defect at the point of sale. Plaintiff and Class members have consequently suffered ascertainable losses and actual damages. Moreover, Plaintiff seeks equitable remedies, including *inter alia*, an order that the

Class Vehicles are defective and injunctive relief preventing FCA from continuing its wrongful conduct as alleged herein.

THE PARTIES

Michael Grynick

24. Plaintiff Michael Grynick is a citizen of California, domiciled in La Canada, California.

25. On or about January 30, 2018, Plaintiff Grynick purchased a 2015 Jeep Grand Cherokee Summit with approximately 23,776 miles on the odometer from a private party, located in La Verne, California. At the time of the purchase, Plaintiff Grynick was a citizen of California, domiciled in La Canada, California.

26. Plaintiff Grynick purchased his Class Vehicle primarily for personal, family, or household use.

27. Passenger safety and reliability were important factors in Plaintiff Grynick's decision to purchase his vehicle. Before making his purchase, Plaintiff Grynick researched the vehicle on Defendant's website, Jeep.com, reviewed the evaluation metrics available at Kelley Blue Book's kbb.com and other vehicle review sites, and reviewed third party forum posts regarding the Jeep Grand Cherokee. Plaintiff also attended a car show in Los Angeles, California, where he viewed the Jeep Grand Cherokee display. Ultimately, Plaintiff Grynick selected and purchased his vehicle because the vehicle was represented to be and was marketed as a high-quality vehicle capable of providing safe, reliable transportation. The purchase was made in part on the advertised safety, reliability, and quality of the vehicle and its components, including its Engine.

28. None of the information provided to Plaintiff Grynick through his research disclosed any defects, including in the Engine or powertrain system. FCA US LLC's omissions were material to Plaintiff Grynick, who was acting as a reasonable consumer. At the time Plaintiff Grynick purchased his Class Vehicle, it was still covered by FCA's manufacturer's warranty.

29. Had FCA disclosed the Defect before Plaintiff Grynick purchased his vehicle, he would have seen such and been aware of the disclosures. Indeed, FCA's misstatements and omissions were material to Plaintiff Grynick, who was acting as a reasonable consumer. Indeed, in purchasing

his vehicle, he relied upon representations from FCA that he saw during his internet research indicating that the vehicle was safe, durable, reliable, and that the engine operated correctly and effectively. He relied on those representations and on FCA US LLC's omission of and failure to disclose the Defect. Like all members of the Class, had he known of the Defect, Plaintiff Grynick would not have purchased his Class Vehicle or would have paid less for the it.

30. At all times during his ownership of the vehicle, Plaintiff Grynick properly maintained and serviced his Class Vehicle according to FCA US LLC's recommended maintenance guidelines.

31. On or about April 1, 2025, when his vehicle had approximately 84,000 miles on the odometer, the Check Engine Light ("CEL") was illuminated. On or about April 4, 2025, Plaintiff Grynick took his vehicle to Hexagon Automotive, LLC, an automobile repair facility located in Montrose, California, to have the CEL examined. The repair facility diagnosed his vehicle as having an engine misfire, and as a result, it repaired and replaced the left cylinder head, replaced all 24 rockers and hydraulic lifters, replaced necessary gaskets, replaced spark plugs, and replaced ignition coils number 2, 4, and 6.

32. Because the warranty on his vehicle had expired, Plaintiff Grynick paid \$4,678.56 for the repair, and he will now bear the cost of any further repairs needed. He is concerned that other parts of the engine may have been damaged due to the Defect.

33. To date, Plaintiff Grynick has received no notification from FCA about any potential permanent repair, modification, or change to the maintenance schedule which would either repair the Defect or prevent the Defect from causing additional damage to his Class Vehicle.

34. As a result of the Defect, Plaintiff Grynick has lost confidence in the ability of his Class Vehicle to provide safe and reliable transportation for ordinary and advertised purposes. Further, Plaintiff Grynick will be unable to rely on FCA US's advertising or labeling in the future, and so will not purchase or lease another vehicle from FCA in the future, though he would like to do so.

35. At all times, Plaintiff Grynick, like all Class Members, has driven his Class Vehicle in a manner that is and was both foreseeable, and in a manner in which it was intended to be used.

Defendant

36. Defendant FCA US LLC is a limited liability company organized and in existence under the laws of the State of Delaware. FCA US LLC's Corporate Headquarters are located at 1000 Chrysler Drive, Auburn Hills, Michigan 48326. FCA designs, manufactures, markets, distributes, services, repairs, sells, and leases passenger vehicles, including the Class Vehicles, in the State of California. FCA is the warrantor and distributor of the Class Vehicles in the United States. FCA's sole member is FCA North America Holdings LLC, a Delaware limited liability company, with its principal place of business located at 1000 Chrysler Drive, Auburn Hills, Michigan 48326. FCA North America Holdings LLC's sole member was Fiat Chrysler Automobiles N.V., which was incorporated as a public limited liability company (a "naamloze vennootschap") under the laws of the Netherlands. Its principal office is located at 25 St. James's Street, London SW1A 1HA, United Kingdom. FCA North America Holding LLC's sole member is now Stellantis N.V., with headquarters at Taurusavenue 1, 2132LS, Hoofddorp, the Netherlands. Stellantis N.V. is traded on the New York Stock Exchange under symbol "STLA."

37. FCA is a motor vehicle manufacturer and a licensed distributor of new, previously untitled motor vehicles. FCA (like its predecessor, Chrysler) is one of the "Big Three" American automakers (with Ford and General Motors). FCA engages in commerce by distributing and selling new and unused passenger cars and motor vehicles under the Chrysler, Dodge, Jeep, Ram, and Fiat brands. Other major divisions of FCA include Mopar, its automotive parts and accessories division, and SRT, its performance automobile division.

38. FCA has designed, manufactured, imported, distributed, offered for sale, sold, and leased the Class Vehicles with the knowledge and intent to market, sell, and lease them in all 50 states. Moreover, FCA and its agents designed, manufactured, marketed, distributed, warranted, sold and leased the Class Vehicles in each state in the United States. Dealers act as FCA's agents in selling automobiles under the Fiat Chrysler name and disseminating vehicle information provided by Fiat Chrysler to customers.

39. FCA has a nationwide dealership network and operates offices and facilities throughout the United States, including in the State of California. In order to sell vehicles to the

general public, FCA enters into agreements with dealerships who are then authorized to sell the brands of vehicles owned by FCA, including Jeep, to consumers such as Plaintiff. In return for the exclusive right to sell new FCA-brand vehicles in a geographic area, authorized dealerships are also permitted to service and repairs these vehicles under the warranties FCA provides directly to consumers. These contracts give FCA a significant amount of control over the actions of the dealerships, including sale and marketing over the vehicles and parts and accessories for those vehicles. All service and repairs at an authorized dealership are also completed according to FCA's explicit instructions, issued through service manuals, technical service bulletins ("TSBs"), and other documents. Per the agreements between FCA and the authorized dealers, consumers such as Plaintiff can receive services under FCA's issued warranties at dealer locations that are convenient to them.

40. FCA also develops and disseminates the owners' manuals, warranty booklets, maintenance schedules, advertising such as vehicle brochures, and other promotion materials relating to Class Vehicles through the dealership network. FCA is also responsible for the production and content of the information on the Monroney Stickers.

41. FCA warrants the Class Vehicles and is the drafter of those warranties, the terms of which unreasonably favor FCA. The warranties given by FCA to Plaintiff and consumers are presented on a "take it or leave it" basis, and Plaintiff and consumers are not given a meaningful choice in the terms of the warranties provided by FCA.

JURISDICTION AND VENUE

83. This action is properly before this Court and this Court has subject matter jurisdiction over this action under the Class Action Fairness Act. At least one member of the proposed class is a citizen of a different state than FCA, the number of proposed class members exceeds 100, and the amount in controversy exceeds the sum or value of \$5,000,000.00 exclusive of interests and costs. *See* 28 U.S.C. § 1332(d)(2)(A).

84. In addition, under 28 U.S.C. § 1367, this Court may exercise supplemental jurisdiction over the state law claims because all of the claims are derived from a common nucleus of operative facts and are such that Plaintiffs would ordinarily expect to try them in one judicial proceeding.

85. This Court has personal jurisdiction over Defendant because it is incorporated in the State of Delaware; has consented to jurisdiction by registering to conduct business in the state; maintains sufficient minimum contacts in Delaware; and otherwise intentionally avails itself of the markets within Delaware through promotion, sale, marketing and distribution of its vehicles, which renders the exercise of jurisdiction by this Court proper and necessary as FCA is “at home” in Delaware.

86. Venue is proper in this District pursuant to 28 U.S.C. § 1391(a)-(c). A substantial part of the events or omissions giving rise to the claims occurred in this District. Plaintiffs may properly sue FCA in this District, FCA’s state of incorporation.

FACTUAL ALLEGATIONS

A. Background of the Subject Engine

42. FCA’s predecessor corporation, DaimlerChrysler AG and its US subsidiary, Chrysler Group³ began developing the Phoenix V-6 engine (now known as the “Pentastar” V-6 engine) in 2005.⁴ According to Bob Lee, FCA’s former Vice President, Head of Engine and Electrified Propulsion Engineering and “part of the Pentastar team,” “[t]here were many times it looked like the Pentastar V-6 wasn’t going to happen.” *Id.* ““When the Pentastar was conceived, we started with a clean sheet of paper and the goal of producing an engine that made the most sense for the customer and for us,” Lee said.”⁵ FCA’s design decisions, however, made little sense for its customers, *i.e.*, consumers, Plaintiff, and Class Members.

³ See Lee Iacocca, Editors of Encyclopedia Britannica, *Chrysler*, last updated Mar. 30, 2024, <https://www.britannica.com/topic/Chrysler> (last visited Apr. 5, 2024).

⁴ See Bob Lee, *10 Million and Counting!* Feb. 19, 2019, <https://blog.stellantisnorthamerica.com/2019/02/19/10-million-and-counting/> (last visited Apr. 5, 2024).

⁵ Mission Accomplished: Pentastar Engine Family Accounts for All Chrysler Group V-6 Offerings, Aug. 28, 2013, <https://media.stellantisnorthamerica.com/newsrelease.do?id=14717&mid=&searchresult> (last visited Apr. 5, 2024).

43. In October 2006, Chrysler Group lost \$1.5 billion in 2006 and DaimlerChrysler was considering selling Chrysler or spinning it off.⁶ “Chrysler said that it was striving to cut its manufacturing and marketing costs by \$1,000 a car, under a plan called Project Refocus [...]” *Id.*

44. In August 2007, “DaimlerChrysler AG . . . completed the sale of an 80 percent stake in its U.S. unit, Chrysler Group, to private equity firm Cerberus Capital Management.”⁷

45. In December 2008, President George W. Bush “announced an emergency financial rescue plan” to aid the “Big Three” automakers, including Chrysler, to “prevent the collapse of the country’s struggling auto industry” by making “immediately available \$13.4 billion government loans from the Troubled Assets Relief Program (TARP), a \$700 billion fund approved by Congress” that would “allow the auto companies to continue operating through March 2009, when they were required to either demonstrate ‘financial viability’ or return the money. An additional stipulation required the companies to undergo restructuring.”⁸ Chrysler was under extraordinary pressure to turn a profit.

46. Soon, in January 2009, Fiat, an Italian automaker, announced it would take a 35 percent stake in Chrysler.⁹ During an interview at the 2009 New York Auto Show, Frank Klegon, Chrysler’s Executive Vice President of Product Development announced the “3.6-liter V6 will replace seven Chrysler engines and can be used in both front- and rear-drive configurations.”¹⁰ Later that month, despite Chrysler’s predictions regarding the future success of its Pentastar program, President Obama forced Chrysler into federal bankruptcy protection to facilitate its alliance with Fiat, a merger investors had previously rejected. “The government would lend about \$8 billion to the

⁶ See Micheline Maynard and Nick Bunkley, *Chrysler Announces \$1.5 Billion Loss*, The New York Times, Oct. 25, 2006, <https://www.nytimes.com/2006/10/25/business/25cnd-motor.html> (last visited Apr. 5, 2024).

⁷ See *DaimlerChrysler completes Chrysler sale to Cerberus*, Reuters, Aug. 9, 2007, <https://www.reuters.com/article/idUSWEB5782/> (last visited Apr. 5, 2024).

⁸ See Lee Iacocca, Editors of Encyclopedia Britannica, *Chrysler*, last updated Mar. 30, 2024, <https://www.britannica.com/topic/Chrysler> (last visited Apr. 5, 2024).

⁹ See Nick Bunkley, *Fiat acquires 35% Stake in Chrysler*, The New York Times, (Jan 20, 2009) <https://www.nytimes.com/2009/01/20/business/worldbusiness/20iht-21chryslerB.19528974.html> (last visited Apr. 5, 2024).

¹⁰ See Bradford Wernle and Automotive News, *Jeep Grand Cherokee Debuts Chrysler V6*, Autoweek, Apr. 8, 2009, <https://www.autoweek.com/news/a2019451/jeep-grand-cherokee-debuts-chrysler-v6/> (last visited Apr. 5, 2024).

company, on top of the \$4 billion it had already provided.”¹¹ “Two months later [Chrysler] finalized its deal with Fiat, which acquired most of Chrysler’s assets and took an initial 20 percent stake in the automaker.”¹² “As part of the reorganization deal, a new company, Chrysler Group LLC, was formed.” *Id.* Bob Lee described “the separation of Chrysler and Daimler, a recession and collapse of auto sales, and then bankruptcy and Cerberus ownership” as “multiple shocks to the [Pentastar] team and the project.”¹³ He wrote, “[w]hile we unveiled the Pentastar V-6 at the New York auto show in April 2009, we had to make our case again when FIAT and [its CEO] Sergio Marchionne arrived. Chris Cowland [Director of Advanced Powertrain] and I pitched the project to Sergio in July and gained approval to stay on track.” *Id.* \

47. On March 18, 2010, “Chrysler Group LLC celebrated the launch of its all-new Pentastar V-6 engine.”¹⁴ According to Scott Garberding, Head of Manufacturing, “[t]he Pentastar engine is a cornerstone of Chrysler’s efforts to re-invent its business model with strong, brand-focused, world-class quality products.” *Id.* The Pentastar V-6 was to be used across the Chrysler, Ram Truck, Jeep, and Dodge product lineup, “resulting in flexibility, efficient operations and significant cost savings to the company.” *Id.* Chrysler announced the first application of the engine would be in the model year 2011 Jeep Grand Cherokee due out in the second quarter of 2010. *Id.*

¹¹ See Jim Rutenberg and Bill Vlasci, *Chrysler Files to Seek Bankruptcy Protection*, The New York Times, Apr. 30, 2009, <https://www.nytimes.com/2009/05/01/business/01auto.html> (last visited Apr. 5, 2024).

¹² See Lee Iacocca, Editors of Encyclopedia Britannica, *Chrysler*, last updated Mar. 30, 2024, <https://www.britannica.com/topic/Chrysler> (last visited Apr. 5, 2024); Stellantis, *Company Historical Timeline*, <https://media.stellantisnorthamerica.com/newsrelease.do?id=19819&mid=709> (last visited Apr. 5, 2024).

¹³ See Bob Lee, *10 Million and Counting!* Feb. 19, 2019, <https://blog.stellantisnorthamerica.com/2019/02/19/10-million-and-counting/> (last visited Apr. 5, 2024).

¹⁴ *Chrysler Group LLC Celebrates Production Launch of Pentastar V-6 Engine at All-new Trenton, Mich., Facility*, Mar. 18, 2010, <https://media.stellantisnorthamerica.com/newsrelease.do?id=9503&mid=&searchresult=true&searchTerms=%26quot%3BPentastar+V-6%26quot%3B> (last visited Apr. 5, 2024).



Figure 2¹⁵

48. The Engine was designed with significant improvements, in particular, (1) a lighter aluminum cast engine block to reduce weight, (2) additional chain drives to replace timing belts, and (3) the introduction of a variable cam timing design, which was meant to be more durable than previous engine designs.

49. Variable cam timing is meant to improve fuel efficiency and reduce emissions, primarily by advancing intake camshaft timing at medium engine speeds. In particular, the variable cam timing used in the Engine, referred to as the “hydraulic cam phasing,” works by varying the camshaft target position at the command of the powertrain control module, or PCM. Variable cam timing, a form of variable valve timing, is aimed at increasing fuel efficiency, but comes at the cost of increasing the mechanical load (*i.e.*, the physical stress) on valvetrain components. As such, any engine designed with variable valve timing or variable cam timing must have valvetrain components that are specifically designed to withstand the expected stress of the system.

¹⁵ Figure 2 depicts one of the earliest iterations of the 3.6L Pentastar V6 engine, previously known as the “Phoenix” engine.

50. The camshaft itself holds the cam lobes, or cams, pointed ovoid shapes which are computer designed to ensure that the valves which allow fuel into the combustion chamber and the valves which allow exhaust gases to leave the combustor chamber are opened and closed at the proper time. In the Pentastar Classic Engine, the RFF come into contact with the cams via a roller in the center of the RFF. As the cam moves, the rotation motion of the lobe is converted into the rocking motion of the RFF arm. This motion then actuates the valve which is in contact with one arm of the RFF, so that corresponding valve opens and closes the intake or exhaust valve on the combustion chamber.

51. The RFF are also in contact with the HLA, or lifters, with one end over the lifter. The lifters, cylinders with an internal piston which actuate themselves by the circulation of engine oil, push up against the RFF as it pushes down on the valve stem. This force minimizes valve lash, or the distance between the RFF and the valve stem. Reduced lash provides a smoother ride and less noise.

52. Figure 3, below, illustrates how the RFF, as denoted by the red arrow, sits with one end over the valve stem and the other end over the lifter.

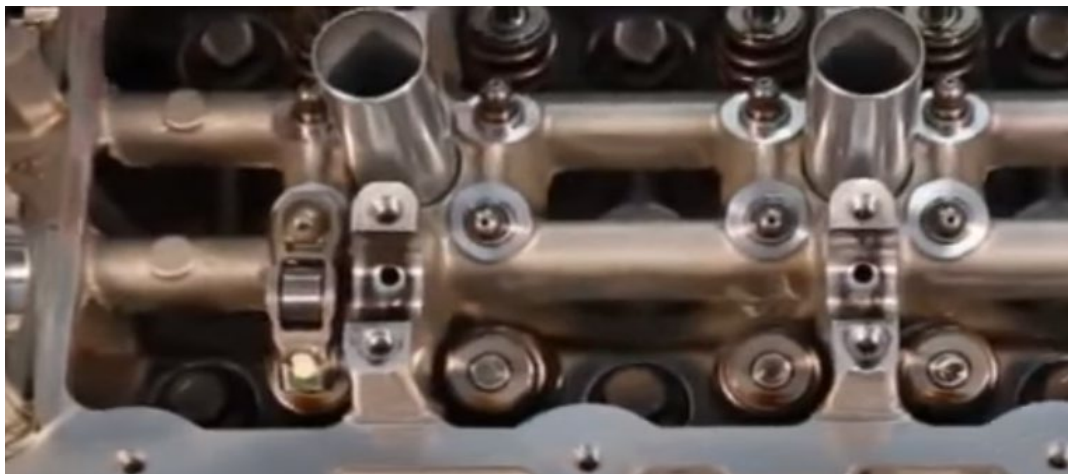


Figure 3

53. As depicted in Figure 3, the RFF in the Engine are particularly small, akin in size to the RFF in motorcycle engines.

54. The RFF in the Engine have a wheel in the center, which spins as it comes into contact with the cam. The wheel is locked into place by needle bearings but can become loose when the needle bearings wear down. When the RFF becomes loose, having been worn down by mechanical load, or breaks, the exhaust valves and the intake valves cannot function correctly, and the cylinder associated with the faulty RFF will be malfunction and misfire.

55. Two other camshafts are installed above the RFF in the Engine, as illustrated Figure 4 below. In total, the Engine has four cam shafts, two each overhead on each of the two banks of the engine.

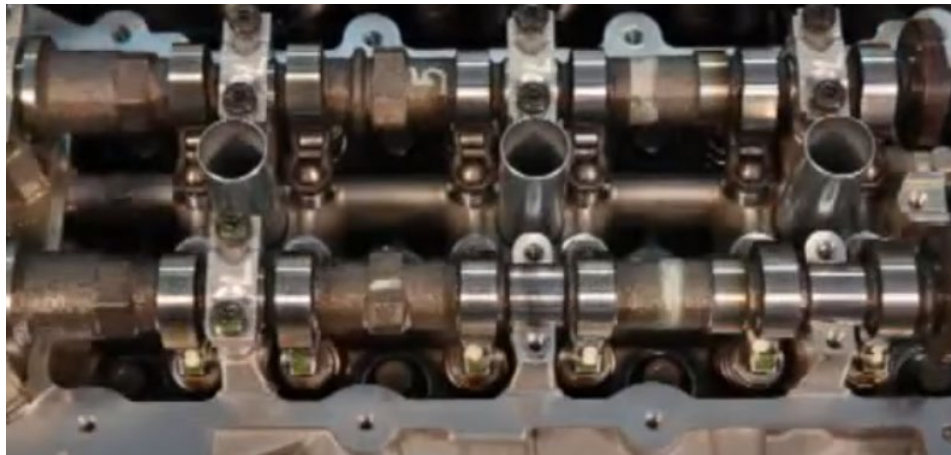


Figure 4

56. In October 2010, Chrysler released general specifications for the Pentastar 3.6-Liter V-6 engine.¹⁶ One month later Chrysler announced specifications for additional Model Year 2011 vehicles available with the engine including the Chrysler 200,¹⁷ Chrysler Town and Country,¹⁸ and Dodge Charger.¹⁹

¹⁶ See Pentastar V-6 Specifications, Oct. 23, 2010, <https://media.stellantisnorthamerica.com/newsrelease.do?id=10150&mid=&searchresult=true&searchTerms=Pentastar> (last visited Apr. 5, 2024).

¹⁷ See 2011 Chrysler 200 Press Kit, Nov. 14, 2010, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=10293&mid=&searchresult=true&searchTerms=%26quot%3BChrysler+200%26quot%3B> (last visited Apr. 5, 2024).

¹⁸ See 2011 Chrysler Town & Country Press Kit, Nov. 14, 2010, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=10302&mid=&searchresult=true&searchTerms=%26quot%3Btown+> (last visited Mar. 19, 2024).

¹⁹ See 2011 Dodge Charger Press Kit, Nov. 14, 2010, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=10294&mid=&searchresult=true&searchTerms=%26quot%3Bdodge+charger%26quot%3B> (last visited Mar. 19, 2024).

57. In August 2013, Chrysler announced that the Pentastar engine family accounted for all Chrysler Group V-6 offerings, powering “16 models across 11 segments – from mid-size car to full-size commercial van.”²⁰

58. According to Mr. Lee, “The Pentastar program is a milestone in Chrysler Group’s ongoing Journey” and “[i]t not only is proof positive of our technical proficiency, it is tangible evidence of our deep-rooted commitment to excellence in powertrain development.” *Id.* “Pentastar engines enhance every vehicle in which they are offered.” “The Pentastar architecture distinguishes itself with flexibility that can best be described as ‘plug-and-play.’” *Id.* “With little or no modification, the 3.6-liter version accommodates longitudinal and transverse orientations; front-wheel-, rear-wheel-, all-wheel- and four-wheel-drive systems; and 6-speed manual and 6-, 8- and 9-speed automatic transmissions.” *Id.*

59. Since 2015, 47 percent of FCA vehicles sold are equipped with a Pentastar V-6 engine.²¹ In June 2015, FCA began to roll out the Pentastar Upgrade engine in various vehicles. On August 31, 2015, FCA announced the “formidable 3.6-liter Pentastar is remade for model-year 2016,” and wrote “[i]ncreased fuel-efficiency was a key impetus in the development of the redesigned 3.6-liter Pentastar V-6 engine. FCA US LLC powertrain engineers evaluated multiple technologies, accumulating more than 4.7 million customer-equivalent miles using computer simulation and physical tests. Improvements were measured right down to the component level. And no improvement was too small to chase.”²² The Press Release continued:

²⁰ See *Mission Accomplished: Pentastar Engine Family Accounts for All Chrysler Group V-6 Offerings*, Aug. 28, 2013, <https://media.stellantisnorthamerica.com/newsrelease.do?id=14717&mid=&searchresult> (last visited Apr. 5, 2024).

²¹ See *Production of the FCA US Pentastar V-6 Engine Family Surpasses 5 Million*, May 27, 2015, <https://media.stellantisnorthamerica.com/newsrelease.do?id=16576&mid=> (last visited Apr. 5, 2024).

²² See *Polishing the Pentastar: FCA US Upgrades Celebrated V-6*, Aug. 31, 2015, <https://media.stellantisnorthamerica.com/newsrelease.do?id=16718&mid=#:~:text=The%20redesigned%203.6%2Dliter%20Pentastar%20V%2D6%20engine%20benefits%20from,with%20the%20engine%27s%20previous%20iteration.> (last visited Apr. 5, 2024).

“With more than five million Pentastars on the road, we have clearly struck a chord in the marketplace,” says Bob Lee, FCA North America Vice President — Engine, Powertrain and Electrified Propulsion and Systems Engineering. “Such success brings enormous responsibility. Accordingly, we focused our efforts on improving efficiency and providing greater customer satisfaction in a package that delivers superior value.”

Id. Regarding the new Pentastar engine’s “torque boost of more than 14.9 percent,” Lee continued:

“We are particularly proud of this achievement because our engineering philosophy revolves around knowing our customers and anticipating their needs and wants. The new 3.6-liter Pentastar delivers a driving experience that is exhilarating.”

Id.

60. FCA simultaneously released press kits including engine specifications for the Model Year 2016 Dodge Durango;²³ Dodge Journey;²⁴ Jeep Grand Cherokee;²⁵ Jeep Wrangler;²⁶ and Ram 1500,²⁷ all available with 3.6L Pentastar V-6 engines, and containing little if any language to inform consumers, Plaintiff, and Class Members whether the newly advertised vehicles would contain the Classic 3.6L Pentastar V-6 Engine with the Defect or the Upgraded 3.6L Pentastar V-6 engine where FCA’s Permanent Corrective Actions included an all new valvetrain design geometry.

61. By early 2019, FCA had produced over 10 million Pentastar V-6 engines.²⁸ On December 18, 2019, FCA and Groupe PSA agreed to merge,²⁹ and in January 2021, Fiat Chrysler

²³ See 2016 Dodge Durango Press Kit, Aug. 31, 2015, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=16934&mid=&searchresult=true&searchTerms=durango> (last visited Apr. 5, 2024).

²⁴ See 2016 Dodge Journey Press Kit, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=16935&mid=&searchresult=true&searchTerms=journey> (last visited Apr. 5, 2024).

²⁵ See 2016 Jeep Grand Cherokee Press Kit, Aug. 31, 2015, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=16945&mid=&searchresult=true&searchTerms=%26quot%3Bgrand+Cherokee%26quot%3B> (last visited Apr. 5, 2024).

²⁶ See 2016 Jeep Wrangler Press Kit, Aug. 31, 2015, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=16948&mid=&searchresult=true&searchTerms=wrangler> (last visited Apr. 5, 2024).

²⁷ See 2016 Ram 1500 Press Kit, Aug. 31, 2015, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=16955&mid=&searchresult=true&searchTerms=%26quot%3Bram+1500%26quot%3B> (last visited Apr. 5, 2024).

²⁸ See Bob Lee, *10 Million and Counting!* Feb 19, 2019, <https://blog.stellantisnorthamerica.com/2019/02/19/10-million-and-counting/> (last visited Apr. 5, 2024).

²⁹ See *Groupe PSA and FCA agree to merge*, Dec. 18, 2019, <https://www.stellantis.com/en/news/press-releases/2019/december/groupe-psa-and-fca-agree-to-merge> (last visited Apr. 5, 2024).

Automobiles N.V. was renamed Stellantis N.V.³⁰ In 2022, Stellantis Media posted Press Kits and engine specifications on its website announcing Model Year 2023 vehicles available with 3.6L Pentastar V-6 engines, where consumers, as in 2015, would have had little to no ability to determine whether their vehicle of choice would include the Upgraded Pentastar engine with Permanent Corrective Actions, *e.g.*, the Jeep Grand Cherokee³¹ and Jeep Gladiator,³² or Classic Pentastar Engines with the Defect, *e.g.*, the Chrysler 300,³³ Dodge Challenger,³⁴ and Dodge Charger.³⁵ In 2016, FCA introduced a new version of the Pentastar V-6 engine, the Pentastar Upgrade, again aiming to increase fuel efficiency by approximately six percent. The Pentastar Upgrade engine included a number of improvements over the Pentastar Classic V-6 engine, including changes to address the Defect in the 3.6L Pentastar Classic V-6 engine. FCA introduced the Pentastar Upgrade engine in a staggered roll out, replacing the 3.6 Pentastar Classic V-6 engine in many of the same vehicle models as the Class Vehicles.

62. The Class Vehicles are all equipped with the 3.6L Pentastar Classic V-6 engine,³⁶ and each Engine is based on the same design.

B. The Defect

63. At the time each Class Vehicles left FCA's possession and control, the incorporated Engine had an inherent and uniform design Defect in the Engine's valvetrain. The 3.6L Pentastar

³⁰ See Stellantis N.V., IRS Form 8937, https://www.stellantis.com/content/dam/stellantis-corporate/investors/fca-groupe-psa-merger/FCA_PSA_Merger_US_IRS_Form_8937-2-23-21.pdf (last visited Apr. 5, 2024).

³¹ See 2023 Jeep Grand Cherokee Press Kit, Jun. 30, 2022, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=23864&mid=&searchresult=true&searchTerms=%26quot%3Bgrand+Cherokee%26quot%3B> (last visited Apr. 5, 2024).

³² See 2023 Jeep Gladiator Press Kit, Aug. 25, 2022, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=24124&mid=&searchresult=true&searchTerms=gladiator> (last visited Apr. 5, 2024).

³³ See 2023 Chrysler 300 Press Kit, Sep. 1, 2022, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=24130&mid=&searchresult=true&searchTerms=%26quot%3Bchrysler+300%26quot%3B> (last visited Apr. 5, 2024).

³⁴ See 2023 Dodge Challenger Press Kit, Sep. 1, 2022, <https://www.media.stellantisnorthamerica.com/newsrelease.do?id=24163&mid=&searchresult=true&searchTerms=challenger> (last visited Mar. 20, 2024).

³⁵ See 2023 Dodge Charger Press Kit, Sep. 1, 2023 (<https://www.media.stellantisnorthamerica.com/newsrelease.do?id=24161&mid=&searchresult=true&searchTerms=charger>) (last visited Apr. 5, 2024).

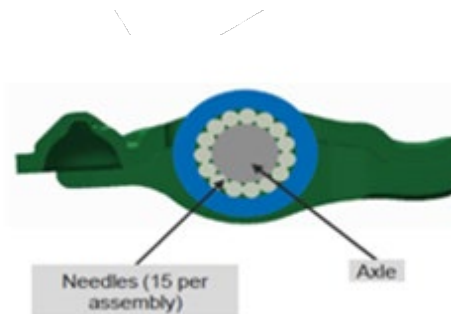
³⁶ FCA engine sales code "ERB."

Classic V-6 engine in each of the Class Vehicles suffers from an under-designed valvetrain causing premature wear, and failure, on the Roller Finger Followers, camshaft, the Hydraulic Lash Adjusters and other components of the valvetrain.

64. The needle bearings in the Engine's RFF of the valvetrain are too narrow to support the mechanical load on the part, causing the needle bearings to fail prematurely. The diameter of the needle bearing has the largest impact on the life of the RFF, significantly more so than the length of the needle bearings.

65. Since the bearings ensure the Roller Finger Followers' smooth rolling movement, when the bearings fail the RFF may wobble, or shift, and no longer snugly connect with the camshaft lobes. This can lead to a ticking sound, commonly referred to as the "Pentastar Tick." The failure of the needle bearings can cause premature wear, and failure, of the RFF and the Camshaft. Since the RFF affects how the valve opens and closes, its failure can impair the operation of the valve.

66. Additionally, as the RFF fails it scrapes on the camshaft, causing metal particles and debris from the failed RFF and related components to potentially jam up or collapse the Hydraulic Lash Adjusters ("HLA") and contaminate the engine oil; circulating throughout the engine, damaging vital components and the engine at-large. Ultimately, if left unrepaired, a failed RFF can cause catastrophic engine failure while the vehicle is being driven, leading to an increased threat of stalling, loss of motive power and collision—creating an increased safety risk.



67. The Defect in the valvetrain in the Engine can cause audible ticking noises from the engine, engine misfires often resulting in bucking and surging, decreased engine performance,

hesitation, loss of power, premature engine wear of internal components such as the RFF, camshaft, and HLA, and can eventually lead to catastrophic engine, failure if not addressed.

68. Because precise valve timing is critical for an engine's performance, the Defect may cause decreased power and acceleration that leads to stalling while driving or even catastrophic engine failure, which can cause the Class Vehicle to shut off in motion and render them unable to be restarted.

69. Simply put, the valvetrain components have been under-designed and cannot withstand the mechanical load and cannot reject the necessary heat of the engine to function adequately. As a result, the Defect prematurely wears valvetrain components which can damage the rest of the Engine, necessitating costly and routine repairs for Engine components which are not intended to be replaced before 100,000 miles.

70. Similarly, other components of the valvetrain are impacted by the Defect, either because they cannot withstand the mechanical load or are defective themselves.

71. FCA was well-aware of the problems of the Defect, and in an effort to remedy them, produced new versions of the RFF for the Engine in 2013.

72. The improvement did not address the root cause of Defect; the RFF needle bearings lacking sufficient diameter. Rather the design change served only to delay the failure of the components and the Engine—often until the Class Vehicle is outside warranty period, deferring the repair costs to the vehicle purchaser or lessee rather than FCA. Indeed, half measures have not prevented Class Vehicles from experiencing the symptoms of the Defect and FCA dealerships and independent mechanics have been inundated with requests for repairs by members of the Class.

73. As explained, FCA has been aware, since at least 2013, that Class Vehicles exhibit excessive warranty rates and in a manner that do not confirm to industry standards, and that the Defect substantially decreases the value of the Class Vehicles by forcing owners/lessees of the Class Vehicles to incur significant out of pocket expenses or hope that FCA will cover the cost to have the Engine repaired or replaced.

74. Even then, repairing or replacing the defective parts does not resolve the Defect because the consumer is left with an engine damaged by defective components and/or receives another defective component in its place. As such, the Defect endangers the drivers and passengers

of the vehicles, while also creating uncertainty for the drivers of the Class Vehicles who cannot reasonably rely on their vehicles to operate consistently, reliably, or safely.

C. FCA's Omissions and Misrepresentations Regarding the Engine

75. Notwithstanding FCA's knowledge of the Defect, as more specifically explained herein, FCA, through media outlets including Stellantis media, touted: "The Pentastar V-6 is the most advanced six-cylinder engine in the history of FCA US, with an ideal integration of select technologies that deliver refinement, fuel efficiency and performance."³⁷

76. Bob Lee, Vice President—Engine and Electrified Propulsion Systems Engineering at Chrysler Group LLC proclaimed that: "Our engineers synthesized the best combination of design features and technologies to create a V-6 engine that will exceed customer needs . . . The elegantly simple design maximizes functionality and provides class-leading levels of refinement, fuel-efficiency, performance and cost of ownership."³⁸

77. Defendant, FCA's, marketing material describes the various Class Vehicles Engines as, among other things: "The most advanced V-6 engine in the company's history—the Pentastar V-6. This new line of V-6 engines will contribute to an overall fuel-efficiency improvement across the Chrysler, Ram Truck, Jeep® and Dodge product lineup. More refined and fuel-efficient."³⁹

78. FCA also markets the Engine as having low costs of ownership: "The advanced oil-filter system eliminates oil spills and contains an incinerable filter element for more efficient disposal than typical oil filters. The use of long-life spark plugs and a high-energy coil-on-plug ignition system also helps to reduce maintenance costs."⁴⁰ However, when the Defect is taken into account, the cost of ownership for the Engine is significantly increased to account for thousands of dollars in replaced valvetrain component costs.

³⁷ See <https://media.stellantisnorthamerica.com/newsrelease.do?id=16576&mid=> (last visited November 3, 2021).

³⁸ See <https://media.stellantisnorthamerica.com/newsrelease.do?id=9506&mid=> (last visited November 3, 2021).

³⁹ *Id.*

⁴⁰ *Id.*

79. In brochures, FCA advertised the Pentastar V-6 Engine as a “workhorse [] designed to deliver the kind of power needed to tackle off-road elements and support all-weather travel on any terrain”⁴¹ and “gives you the goods to go forth with confidence.”⁴²

80. FCA further touts the Engines and makes other express representations and warranties about their quality, durability, and performance, as well as the value that it adds to the Class Vehicles, thus, making the Engines a selling feature to attract customers.

81. FCA’s warranty also gave the consumer the false impression that the vehicle was without defect.

82. However, in truth, FCA knew before selling the Class Vehicles that the Engines suffered from the Defect, but never disclosed that knowledge.

83. It never disclosed that the Engine suffered from a Defect on the Monroney window sticker on the Class Vehicles.

84. It never disclosed that the Engine suffered from a Defect in the Class Vehicles owner’s manual, sales documents, displays, advertisements, warranties, or on FCA’s website.

85. FCA also withheld the nature of the defect from its dealers. FCA issued numerous STAR Case reports, wherein FCA instructed dealers on how to repair customer’s vehicles, but never disclosed in those reports that the Engine suffered from a defective valvetrain design.

D. FCA Had Exclusive and Superior Knowledge of the Defect

86. FCA fraudulently, intentionally, negligently and/or recklessly omitted and concealed from Plaintiff and members of the Class the Defect in Class Vehicles, even though FCA knew or should have known of the design, Defect in the Class Vehicles.

87. As discovery will show, knowledge and information regarding the Defect were in the exclusive and superior possession of FCA and its network of authorized dealerships, and that information was not provided to Plaintiff and members of the Classes – either before their purchase or lease of Class Vehicles or when they sought repairs for their vehicles. As discovery will show,

⁴¹ See https://www.jeep.com/assets/pdf/cherokee_2015.pdf (last visited January 6, 2022).

⁴² See <http://www.motorologist.com/wp-content/uploads/2015-Jeep-Wrangler-brochure.pdf> (last visited January 6, 2022).

based on pre-production testing, early consumer complaints made to FCA's network of dealerships, aggregate warranty data compiled from those dealers, repair orders and parts data received from those dealers, aggregate auto parts stores, consumer, and independent mechanic orders of replacement parts, and consumers complaints to dealers and NHTSA and testing performed in response to those complaint, *inter alia*, FCA was aware or should have been aware of the Defect in the Class Vehicles. Discovery will show that FCA fraudulently concealed the Defect and its associated safety risk from Plaintiff and members of the Classes.

88. FCA knew, or should have known, that the Defect and the associated safety risk was material to owners and lessees of Class Vehicles and was not known or reasonably discoverable by Plaintiff and members of the Classes before they purchased or leased Class Vehicles or within applicable warranty periods.

89. Notwithstanding FCA's exclusive and superior knowledge of the Defect, FCA failed to disclose the Defect to consumers at the time of purchase or lease of the Class Vehicles (or any time thereafter) and continues to sell Class Vehicles suffering from the Defect. As discovery will show, FCA intentionally concealed that the Defect presents a safety risk to consumers, including Plaintiff and members of the Classes, and the public.

90. In fact, before the first assembly of the Engine, the Engine benefited from more than 45,000 hours of computer analysis to optimize the design. Once assembled, the engines were thoroughly tested and evaluated on dynamometers and in vehicles. More than 12 million customer equivalent miles were logged on the dynamometers, followed by vehicle testing of nearly 4 million customer equivalent miles.⁴³ In particular, "a test batch of engines were made in February 2009, and sent to Roush Industries for extensive hot testing, to find any problems before customers."⁴⁴ (Hereinafter referred to collectively as the "pre-production testing.") This and similar pre-production testing revealed or should have revealed the Defect to FCA.

91. As a result of its exclusive and superior knowledge regarding the Defect, FCA released several bulletins describing issues related to the Defect to their exclusive network of dealerships.

⁴³ See e.g., <https://www.towbindodge.net/pentastar-v6/> (last visited November 3, 2021).

⁴⁴ See e.g., <https://www.pentastars.com/engines/tech.php> (last visited November 10, 2021).

These known as Reports and by FCA response to complaints

March issued to Dodge, Jeep STAR Case which listed

STAR Case



Case Number: S1309000016

Release Date: 03/18/2014

Symptom/Vehicle Issue: Ticking/Tapping Noise From Upper Engine Area

Diagnosis: Remove components required to gain access for proper inspection of each rocker arm roller bearing for missing or worn needle bearings (Fig.1 & Fig.2). Also inspect for collapsed lash adjusters (Fig.3) and replace as required. Please note that this condition is typically found on vehicles with mileage accumulation of 15K miles or more.

NOTE: This failure may also set DTC for Mis-Fire.



(Fig.1)



(Fig.2)

[Contact the STAR Center for assistance if no solution is found](#)

Chrysler Group LLC

Version 3

bulletins are STAR Case they are issued engineers in consumer from the field.

92. In 2014, FCA authorized Ram, Chrysler and dealerships #S1309000016, a vehicle symptom/issue

related to the Engine as “Ticking/tapping Noise From Upper Engine Area with possible Misfire DTCs.” (hereinafter the “2014 Bulletin”).

93. The 2014 Bulletin stated “this condition is typically found on vehicles with mileage accumulation of 15K miles or more.” *Id.* FCA also advised service personnel to, “Replace all Rocker Arms with latest superseded part.” FCA knew that merely replacing under-designed RFF with the same under-designed RFF was not a permanent correction of the Defect.

94. Discovery will show what FCA employees, agents, executives, officers, and directors knew about the true cause and extent of the Defect, including that they had knowledge of the Defect and attempted to hide the true cause and extent of the Defect by employing a half-measure to protect FCA from absorbing the full projected cost of warranty claim replacements for the Defect by releasing a Technical Service Bulletin that required customers to proactively bring their vehicles into

dealerships for service and which would be covered under an extended warranty rather than recalling the vehicles and replacing the components before the components caused engine misfires.

95. On June 8, 2016, in another STAR CASE, #S1609000027, FCA advised dealership service technicians that if vehicles' engines made a loud tapping/tricking noise from the top of the engine, service personnel should "remove the valve covers and inspect for potential collapsed Hydraulic Lash Adjusters (HLA)" and "rotate the engine over slowly by hand to check all locations. A collapsed HLA may be indicated by a loose rocker arm when the cam lobe is positioned with the lobe away from the roller." FCA still advised dealership technicians to only replace lash adjusters if they were completely collapsed, not just spongy, and failed to advise dealers to replace the left side cylinder heads of Class Vehicles. FCA did this knowing that these parts already needed to be replaced due to the Defect and that replacing the parts would not cure the Defect.

96. In addition to FCA's own internal testing, investigation and knowledge of the Defect, FCA had knowledge from outside as well, including customer complaints on the NHTSA's website.

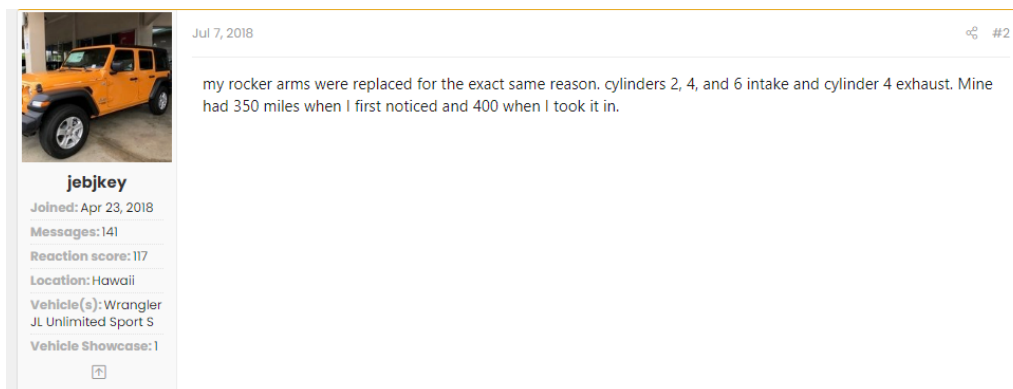
97. Federal law requires automakers like FCA to be in close contact with NHTSA regarding potential auto defects, including imposing a legal requirement (backed by criminal penalties) compelling the confidential disclosure of defects and related data by automakers to NHTSA, including field reports, customer complaints, and warranty data. *See* TREAD Act, Pub. L. No. 106-414, 114 Stat.1800 (2000).

98. Automakers have a legal obligation to identify and report emerging safety-related defects to NHTSA under the Early Warning Report requirements. *Id.* Similarly, automakers monitor NHTSA databases for consumer complaints regarding their automobiles as part of their ongoing obligation to identify potential defects in their vehicles, including those which are safety-related. *Id.*

99. Consumers may file vehicle safety-related complaints through the NHTSA website, where they are logged and published. The customer complaints are easily sorted by make, model, and year of vehicle. Based on the legal obligations discussed above, FCA and/or FCA personnel would review NHTSA's website for complaints. Thus, FCA knew or should have known of the many complaints about the Defect logged by NHTSA ODI. The content, consistency, and disproportionate number of those complaints alerted, or should have alerted, FCA to the Defect in as early as 2014.

With respect solely to the Class Vehicles, attached hereto as Exhibit 1, is a sampling of these complaints⁴⁵ filed with the NHTSA for the Class Vehicles, which are available on the NHTSA’s website, www.safercar.gov. These excerpts of customer complaints are but a few examples of the many complaints concerning the Defect. Many of the complaints reveal that FCA, through its network of dealers and repair technicians, had been made aware of the Defect. In addition, the complaints indicate that despite having knowledge of the Defect and even armed with knowledge of the exact vehicles affected, FCA often refused to diagnose the defect or otherwise attempt to repair it while Class Vehicles were still under warranty.

100. Consumers have also posted extensively on websites dedicated to discussions of FCA vehicles regarding the defect in vehicles equipped with the Pentastar Engines. FCA has made the monitoring of consumer complaints as posted on third-party websites a part of their brand and reputational management for at least a decade.⁴⁶ Attached hereto as Exhibit 2 is a sampling of those complaints, many similar to this thread dedicated to the “Rocker Arm Issue”⁴⁷:



⁴⁵ Plaintiff is unsure of the precise number of NHTSA complaints related to the Defect – while reports about the symptoms of the Defect in Class Vehicles begin in 2013, many do not specifically mention valvetrain components such as the RFF. However, approximately 140 complaints were filed with NHTSA within the past five years specifically mentioning the “rocker arms” or “rockerarms,” and Plaintiff believes discovery will show that many complaints at least relate to the Defect and its symptoms.

⁴⁶ Read, Richard, “*Taking your car complaint online? Chrysler, GM, and Ford will see it*,” Christian Science Monitor, Aug. 21, 2012, <https://www.csmonitor.com/Business/In-Gear/2012/0827/Taking-your-car-complaint-online-Chrysler-GM-and-Ford-will-see-it>. (last visited December 10, 2021)

⁴⁷ <https://www.jlwranglerforums.com/forum/threads/rocker-arm-issue.11303/>

101. Consumers have also posted extensively on websites dedicated to discussions of FCA vehicles regarding the defect in vehicles equipped with the Pentastar Engines with respect to cylinder misfire⁴⁸:



102. FCA acknowledged it monitors such complaints on www.JeepCherokeeClub.com, on April 4, 2016, and assuring consumers that online customer complaints would *not* merely be a blip on FCA’s radar, instead FCA personnel would actively “monitor a myriad of FCA brand forums” to ensure customer satisfaction and resolution of issues:

⁴⁸See e.g., https://www.challengertalk.com/threads/cylinder-4-misfire-pentastar-3-6l-v6.220938/?nested_view=1&sortby=oldest (last visited Apr. 5, 2024).

Hi all, sorry for the delay!

There are several of us who monitor a myriad of FCA brand forums. We are Customer Care representatives from FCA HQ and are here to assist when you have questions or concerns with your vehicle. For customers outside the United States, we can help by providing contact information for our international teams.

Kori
Jeep Social Care Specialist⁴⁹

E. Applicable Warranties

103. FCA sold the Class Vehicles with a “Basic Limited Warranty” (“BLW”), which provides bumper-to-bumper coverage for a period of three years or 36,000 miles, whichever occurs first.

104. The BLW states:

The Basic Limited Warranty covers the cost of all parts and labor needed to repair any item on your vehicle when it left the manufacturing plant that is defective in material, workmanship or factory preparation. There is no list of covered parts since the only exception are tires and headphones. You pay nothing for these repairs. These warranty repairs or adjustments including all parts and labor connected with them will be made by an authorized dealer at no charge, using new or remanufactured parts.

105. In addition, FCA provides a “Powertrain Limited Warranty (“PLW”), which provides coverage to the Class Vehicles’ powertrain components, including the Engine components at issue here, for a period of five years or 60,000 miles⁵⁰, whichever occurs first.

106. The PLW states:

The Powertrain Limited Warranty covers the cost of all parts and labor needed to repair a powertrain component listed in “section 2.4 E” that is defective in workmanship and materials.

107. Section 2.4 E, in turn, covers the parts and components of the Class Vehicles’ Engines, including:

⁴⁹ See e.g., <https://www.jeepcherokeecub.com/threads/fca-is-watching-this-forum.179465/page-4> (last visited Apr. 5, 2024).

⁵⁰ Some consumers received a powertrain limited warranty of 7 years and/or 100,000 miles, particularly those who purchased their vehicles certified pre-owned.

Cylinder block and all internal parts; cylinder head assemblies; timing case, timing chain, timing belt, gears and sprockets; vibration damper; oil pump; water pump and housing; intake and exhaust manifolds; flywheel with starter ring gear; core plugs; valve covers; oil pan; turbocharger housing and internal parts; turbocharger wastegate actuator; supercharger; serpentine belt tensioner; seals and gaskets for listed components only.

108. To date, FCA has been unable to provide a permanent remedy that actually repairs the Defect or prevents it from recurring. Accordingly, irrespective of the applicable model year of any Class Vehicle, or whether it is a new or used vehicle, FCA's representations that it would "[c]over the cost of all parts and labor needed to repair any item on your vehicle when it left the manufacturing plant that is defective in material, workmanship or factory preparation" were materially false to the extent that FCA could not (and did not intend to) repair the Defect as it was obligated to do under the BLW.

109. To the extent FCA's warranty does not cover design defects, it was unconscionable for FCA to exclude them from its warranty coverage while having full knowledge of the Defect and failing to disclose it to consumers. The warranty gave the consumer the false impression that the vehicle was without defect.

110. Similarly, FCA's representations that it "cover[] the cost of all parts and labor needed to repair a powertrain component," as obligated under the PLW, are also materially false.

111. The full terms and conditions of the warranty are not presented to consumers prior to purchasing their vehicles. The warranties were drafted by FCA without any input from consumers and are presented to consumers on a take-it-or-leave-it basis. Further, under the terms of the warranty, FCA retains full authority on whether to authorize repairs under the warranty.

F. Fraudulent Concealment Allegations

112. Until discovery in this litigation, purchasers of the Class Vehicles, including Plaintiff, were unaware of, and unable through reasonable investigation to obtain, the true names and identities of those individuals at FCA responsible for disseminating false and misleading marketing materials and information regarding the Class Vehicles. FCA necessarily is in possession of and had access to all of this information.

113. Plaintiff's claims arise out of FCA's fraudulent concealment of the Defect and the problems it causes, and its representations about the quality, durability, and performance of the Class Vehicles, including their Engines.

114. To the extent that Plaintiff's claims arise from FCA's fraudulent concealment, there is no one document or communication, and no one interaction, upon which Plaintiff bases his claims. Plaintiff alleges that at all relevant times, including specifically at the time they purchased or leased their Class Vehicles, FCA knew, or was reckless in not knowing, of the Defect; FCA was under a duty to disclose the Defect based upon its exclusive knowledge of it, its affirmative representations about it, and its concealment of it, and FCA never disclosed the Defect to Plaintiff or the public at any time or place or in any manner.

115. Plaintiff makes the following specific fraud allegations with as much specificity as possible, although they do not have access to information necessarily available only to FCA:

- a. **Who:** FCA actively concealed the Defect from Plaintiff and Class members while simultaneously touting the quality, durability and performance of the Class Vehicles and their Engines. Plaintiff at the time of filing this lawsuit, was unaware of, and therefore unable to identify, the true names and identities of those specific individuals at FCA responsible for such decisions.
- b. **What:** FCA knew that the Class Vehicles suffer from the Defect. FCA concealed the Defect and made contrary representations about the quality, durability, performance, and other attributes of the Class Vehicles.
- c. **When:** FCA concealed material information regarding the Defect at all times and made representations about the quality, durability, and performance of the Class Vehicles, starting as early as 2013, or at the subsequent introduction of certain models of Class Vehicles to the market, continuing through the time of sale/lease, and on an ongoing basis, and continuing to this day. FCA has not disclosed the truth about the Defect in the Class Vehicles to anyone outside of FCA. FCA has never taken any action to inform consumers about the true nature of the Defect in Class Vehicles. And when consumers brought their Class Vehicles to FCA complaining of the symptoms

associated with the Defect, FCA denied any knowledge of, or responsibility for, the Defect.

- d. **Where:** FCA concealed material information regarding the true nature of the Defect in every communication it had with Plaintiff and Class members and made contrary representations about the quality, durability, and performance of the Class Vehicles and their Engines. Plaintiff is aware of no document, communication, or other place or thing in which FCA disclosed the truth about the Defect in the Class Vehicles to anyone outside of FCA. Such information is not adequately disclosed in any sales documents, displays, advertisements, warranties, owner's manual, or on FCA's website.
- e. **How:** FCA concealed the Defect from Plaintiff and Class members and made representations about the quality and durability of the Class Vehicles. FCA actively concealed the truth about the existence and nature of the Defect from Plaintiff and Class members at all times, even though it knew about the Defect and knew that information about the Defect would be important to a reasonable consumer, and FCA promised in its marketing materials that the Class Vehicles have qualities that they do not have, and moreover, made representations in its warranties that it knew were false, misleading, and deceptive.
- f. **Why:** FCA actively concealed material information about the Defect in Class Vehicles, and simultaneously made representations about the quality, durability, and performance of the Class Vehicles and their Engines, for the purpose of inducing Plaintiff and Class members to purchase or lease the Class Vehicles, rather than purchasing or leasing competitors' vehicles. Had FCA disclosed the truth, for example, in its advertisements or other materials or communications, Plaintiff (and reasonable consumers) would have been aware of the Defect and would not have bought the Class Vehicles or would have paid less for them.

G. FCA Has Actively Concealed the Defect

116. Despite its knowledge of the Defect in the Class Vehicles, Defendant actively concealed the existence and nature of the Defect from Plaintiff and Class Members. Specifically, Defendant failed to disclose to or actively concealed from Plaintiff and Class Members, at and after the time of purchase, lease, or repair, and thereafter:

- a. any and all known material defects or material nonconformities of the Class Vehicles, including the Defect;
- b. that the Class Vehicles were not in good working order, were defective, and were not fit for their intended purpose; and
- c. that the Class Vehicles were defective, even though FCA learned of the Defect before it placed the Class Vehicles in the stream of commerce.

117. More troubling, Defendant did not issue any recall and otherwise refuses to acknowledge the Defect, despite Star Cases as early as 2014 recognizing the Defect. The Star Cases were never released to the public, despite the numerous repairs and reports of symptoms. FCA also refuses to acknowledge ongoing complaints made as a result of the Defect, even as a vehicle has been repaired and certain RFF and related parts and components were replaced. Indeed, FCA has refused to honor its warranty or admit the existence of the Defect after these repairs have taken place.

118. Further, FCA re-designed several engine parts associated with the Defect, but did not notify current owners or lessees of the re-design or encourage replacement of older engines with the re-designed parts. The re-design did not address the root causes of the Defect, but rather acted as a half-measure that served to simply delay the premature failure of the valvetrain components, deferring the cost of the repairs to the consumer.

119. FCA has also directed its authorized dealerships to inform Plaintiff and members of the Class that ticking and knocking noises are normal and that no repairs are necessary, so consumers will delay repairs until after the warranty period has expired. In this way, FCA unfairly transfers the cost of repair to Plaintiff and Class Members and reduces its own recall and warranty costs.

120. Defendant has deprived Class Members of the benefit of their bargain, exposed them all to a dangerous safety Defect, and caused them to expend money at their dealerships and/or be unable to drive their vehicles for long stretches of time, while they are being constantly repaired.

121. Moreover, when vehicles are brought to Defendant's dealers for repair, whether covered by warranty or not, Class Members are provided with ineffective repairs in which defective parts are replaced with other defective parts, as experienced by Plaintiff.

122. As a result, Class Members continue to experience the Defect despite having repairs, as shown by the experiences of Plaintiff. Because many Class Members, like Plaintiff, are current owners or lessees who rely on their vehicles on a daily basis, compensation for repairs, related expenses (*e.g.*, towing), and diminution in value is not sufficient. A remedial scheme which also makes available a fix and/or warranty extension is necessary to make Class Members whole.

123. Defendant has not recalled all the Class Vehicles to repair the Defect, has not offered to its customers a free suitable repair or free replacement of parts related to the Defect, under the recall or otherwise, and has not reimbursed all Class Vehicle owners and leaseholders who incurred costs for repairs related to the Defect.

124. Class Members have not received the value for which they bargained when they purchased or leased the Class Vehicles.

125. As a result of the Defect, the value of the Class Vehicles has diminished, including without limitation, the resale value of the Class Vehicles.

126. The existence of the Defect is a material fact that a reasonable consumer would consider when deciding whether to purchase or lease a Class Vehicle. When a vehicle's engine has a defect in its valvetrain that can cause the engine components to prematurely fail, resulting to decreased engine performance, loss of power, and eventual catastrophic engine failure it is a material safety concern. Had Plaintiff and other Class Members known of the Defect, they would have paid less for the Class Vehicles or would not have purchased or leased them. It also causes a diminution in the value of the Class Vehicles.

127. Reasonable consumers, like Plaintiff, expect that a vehicle is safe, will function in a manner that will not pose a safety risk, is free from defects, and will not malfunction while operating

the vehicle as it is intended. Plaintiff and Class Members further expect and assume that FCA will not sell or lease vehicles with known safety defects, such as the Defect, and will fully disclose any such defect to consumers prior to purchase or offer a suitable non-defective repair.

128. The Class Vehicles do not function as FCA intended; no manufacturer intends for a vehicle's engine components to premature fail, resulting to decreased engine performance, loss of power, and eventual catastrophic engine failure.

TOLLING OF THE STATUTE OF LIMITATIONS

A. Fraudulent Concealment

129. As previously described, any applicable statute(s) of limitations has been tolled by FCA's knowing and active concealment and denial of the facts alleged herein. Plaintiff and members of the Class could not have reasonably discovered the nature of the Defect prior to this class action litigation being commenced.

130. FCA was and remains under the continuing duty to disclose to Plaintiff and members of the Class the true character, quality and nature of the Class Vehicles, and it will require costly repairs, poses a safety concern, and diminished the resale value of the Class Vehicles. As a result of the active concealment by FCA, any and all applicable statutes of limitations otherwise applicable to the allegations herein have been tolled.

131. FCA has known of the Defect in the Class Vehicles since at least 2010, and has concealed from, or failed to, notify Plaintiff, Class members, and the public of the full and complete nature of the Defect, even when directly asked about it by Plaintiff and Class members during communications with FCA, FCA Customer Assistance, FCA dealerships, and FCA service centers. FCA continues to conceal the Defect to this day.

B. Estoppel

132. FCA was, and is, under a continuous duty to disclose to Plaintiff and Class members the true character, quality, and nature of the Class Vehicles. FCA actively concealed – and continues to conceal – the true character, quality, and nature of the Class Vehicles and knowingly made representations about the quality and durability of the Vehicles. Plaintiff and Class members reasonably relied upon FCA's knowing and affirmative representations and/or active concealment of

these facts. Based on the foregoing, FCA is estopped from relying on any statutes of limitation in defense of this action.

C. Discovery Rule

133. The causes of action alleged herein did not accrue until Plaintiff and Class members discovered that their Class Vehicles suffered from the Defect.

134. However, Plaintiff and Class members had no realistic ability to discern that the Class Vehicles were defective until – at the earliest – after the Defect caused their Engines and/or component parts failed.

135. Even then, Plaintiff and Class members had no reason to know that such failures, or the pre-failure symptoms described above, were caused by a defect in the Class Vehicles because of FCA’s active concealment of the Defect. Not only did FCA fail to notify Plaintiff or Class members about the Defect, FCA, in fact, denied any knowledge of, or responsibility for, the Defect when directly asked about it.

136. Thus, Plaintiff and Class members were not reasonably able to discover the Defect until after they had purchased or leased the Class Vehicles, despite their exercise of due diligence, and their causes of action did not accrue until, at earliest, they discovered that the Engines of their vehicles required repair or replacement due to a failure in the valvetrain.

CLASS ALLEGATIONS

87. Plaintiffs bring this action pursuant to Rule 23(a), 23(b)(2) and 23 (b)(3) of the Federal Rules of Civil Procedure on behalf of themselves and as the following proposed classes:

California Class:

All persons or entities that purchased or leased a Class Vehicle within California or that purchased or leased a Class Vehicle and reside in California.

CLRA Sub-Class:

All members of the California Class who are “consumers” within the meaning of California Civil Code § 1761(d).

137. Excluded from the Class are Defendant; its employees, officers, directors, legal representatives, heirs, successors, and wholly or partly owned subsidiaries or affiliates of Defendant; Defendant's dealers; Class Counsel and their employees; the judicial officers and their immediate family members and associated court staff assigned to this case; and all persons within the third degree of relationship to any such persons.

138. Certification of Plaintiff's claims for Class-wide treatment is appropriate because Plaintiff can prove the elements of their claims on a Class-wide basis using the same evidence as would be used to prove those elements in individual actions alleging the same claim.

139. This action has been brought and may be properly maintained on behalf of each of the Classes proposed herein under Fed. R. Civ. P. 23.

140. **Numerosity.** Although the exact number of Class Members is uncertain and can only be ascertained through appropriate discovery, the number is great enough that such joinder is impracticable. The disposition of the claims of these Class Members in a single action will provide substantial benefits to all parties and to the Court. The Class Members are readily identifiable from information and records in FCA's possession, custody, and/or control as well as from records kept by the Department of Motor Vehicles.

141. **Commonality and Predominance.** Rules 23(a)(2) and (b)(3) of the Federal Rules of Civil Procedure: This action involves common questions of law and fact, which predominate over any questions affecting individual Class members, including, but not limited to the following:

- a. Whether Class Vehicles suffer from the Defect;
- b. Whether FCA engaged in the conduct alleged herein;
- c. Whether the Defect constituted an unreasonable safety risk;
- d. Whether the Defect constitutes a material fact;
- e. Whether FCA designed, manufactured, advertised, marketed, distributed, leased, sold, or otherwise placed Class Vehicles into the stream of commerce in the United States;
- f. Whether FCA designed, manufactured, marketed, and distributed Class Vehicles with the Defect;

- g. Whether Defendant has a duty to disclose the defective nature of the 3.6L Pentastar Classic V6 Engine to Plaintiff and Class Members;
- h. Whether Plaintiff and Class members overpaid for their Class Vehicles and/or did not receive the benefit of the bargain;
- i. Whether Defendant should be declared financially responsible for notifying all Class Members of the problems with the Class Vehicles and for the costs and expenses of repairing and replacing the defective 3.6L Pentastar Classic V6 Engine;
- j. Whether Plaintiff and Class members are entitled to damages and other monetary relief and, if so, in what amount;
- k. Whether FCA's alleged conduct constitutes the use or employment of an unconscionable commercial practice, deception, fraud, false pretense, false promise, and misrepresentation within the meaning of the applicable state consumer fraud statutes;
- l. Whether Defendant FCA breached the implied warranty or merchantability pursuant to the applicable laws governing the corresponding Sub-Class;
- m. Whether FCA violated California's Consumers Legal Remedies Act;
- n. Whether FCA actively concealed the Defect in order to maximize profits to the detriment of Plaintiff and Class members; and
- o. Such other common factual and legal issues as are apparent from the allegations and causes of action asserted in this Complaint.

142. **Typicality.** Plaintiff's claims are typical of the claims of the Class and Sub-Classes in the Plaintiff, like all Class Members, purchased or leased a Class Vehicle designed, manufactured, and distributed by FCA, and equipped with the 3.6L Pentastar Classic V-6 Engine. The representative Plaintiff, like all Class Members, have been damaged by FCA's misconduct in that they have incurred or will incur the cost of repairing or replacing the defective 3.6L Pentastar Classic Engine. Plaintiff's claims are typical of the other Class members' claims because, among other things, all Class members

were comparably injured through FCA's wrongful conduct as described above. All claims seek recovery on the same legal theories and are based upon FCA's common course of conduct.

143. **Adequacy**. Plaintiff will fairly and adequately protect the interests of the Class members. Plaintiff has retained attorneys experienced in the prosecution of class actions, including consumer and product defect class actions, and Plaintiff intends to prosecute this action vigorously. The Class's interests will be fairly and adequately protected by Plaintiff and his counsel.

144. **Declaratory Relief**. Rule 23(b)(2) of the Federal Rules of Civil Procedure: FCA has acted or refused to act on grounds generally applicable to Plaintiffs and Class members, thereby making appropriate declaratory relief, with respect to each Class as a whole.

145. **Superiority**. Rule 23(b)(3) of the Federal Rules of Civil Procedure: A class action is superior to any other available means for the fair and efficient adjudication of this controversy, and no unusual difficulties are likely to be encountered in the management of this class action. The damages or other financial detriment suffered by Plaintiff and Class members are relatively small compared to the burden and expense that would be required to individually litigate their claims against FCA, so it would be impracticable for Class members to individually seek redress for FCA's wrongful conduct. Even if Class members could afford individual litigation, the court system could not. Individualized litigation creates a potential for inconsistent or contradictory judgments, and increases the delay and expense to all parties and the court system. By contrast, the class action device presents far fewer management difficulties and provides the benefits of single adjudication, economy of scale, and comprehensive supervision by a single court.

CAUSES OF ACTION

COUNT I

Fraud by Omission or Fraudulent Concealment

(On behalf of the California Class)

146. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 164 above as if fully set forth herein.

147. Plaintiff brings this cause of action on behalf of himself and the California Class, against Defendant.

148. FCA knew that the Class Vehicles suffered from an inherent Defect, were defectively designed and/or manufactured and were not suitable for their intended use.

149. Defendant concealed from and failed to disclose to Plaintiff and Class Members the defective nature of the Class Vehicles.

150. Defendant was under a duty to Plaintiff and Class Members to disclose the defective nature of the Class Vehicles because:

- a. Defendant was in a superior position to know the true state of facts about the safety defect suffered by the Class Vehicles;
- b. The omitted facts were material because they directly impact the safety of the Class Vehicles;
- c. Defendant knew the omitted facts regarding the Defect were not known to or reasonably discoverable by Plaintiff and Class Members;
- d. Defendant made partial disclosures about the quality of the Class Vehicles without revealing their true defective nature; and,
- e. Defendant actively concealed the defective nature of the Class Vehicles from Plaintiff and Class Members.

151. The facts concealed or not disclosed by Defendant to Plaintiff and the other Class Members are material in that a reasonable person would have considered them to be important in deciding whether to purchase or lease Defendant's Class Vehicles or pay a lesser price for them. A vehicle's engine with a defect in its valvetrain, which can cause the engine components to prematurely fail, resulting to decreased engine performance, loss of power, and eventual catastrophic engine failure, is a material safety concern. Had Plaintiff and Class Members known about the defective nature of the Class Vehicles, they would not have purchased or leased the Class Vehicles or would have paid less for them.

152. Defendant concealed or failed to disclose the true nature of the design and/or manufacturing defects suffered by the Class Vehicles to induce Plaintiff and Class Members to act thereon. Plaintiff and the other Class Members justifiably relied on Defendant's omissions to their

detriment. This detriment is evident from Plaintiff's and Class Members' purchase or lease of Defendant's defective Class Vehicles.

153. Defendant continued to conceal the defective nature of the Class Vehicles even after Class Members began to report the problems. Indeed, Defendant continues to cover up and conceal the true nature of the problem today.

154. As a direct and proximate result of Defendant's misconduct, Plaintiff and Class Members have suffered and will continue to suffer actual damages. Plaintiff and the Class reserve their right to elect either to (a) obtain restitution or (b) affirm their purchase or lease of the Defective Vehicles and recover damages.

155. Defendant's acts were done maliciously, oppressively, deliberately, with intent to defraud, and in reckless disregard of Plaintiff's and the Class's rights and well-being to enrich Defendant. Defendant's conduct warrants an assessment of punitive damages in an amount sufficient to deter such conduct in the future, which amount is to be determined according to proof.

COUNT II

Violation of the California's Consumers Legal Remedies Act

(California Civil Code § 1750, *et seq.*)

(On Behalf of the California Class and CLRA Sub-Class against Defendant)

156. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 164 above as if fully set forth herein.

157. Plaintiff bring this cause of action on behalf of himself and on behalf of the members of the California Class and the CLRA Sub-Class.

158. Plaintiff, the California Class members and the CLRA Sub-Class members are "consumers" within the meaning of California Civil Code § 1761(d) because they purchased their Class Vehicles primarily for personal, family, or household use.

159. FCA is a "person" as that term is defined in California Civil Code § 1761(c).

160. The purchase and leases of Class Vehicles by Plaintiff, the California Class members and the CLRA Sub-Class members constitute "transactions" as defined by the CLRA. Cal. Civ. Code § 1761(e)

161. The Class Vehicles constitute “goods” or “services” as defined by the CLRA. Cal. Civ. Code § 1761(a) and (b).

162. By failing to disclose the Defect, by concealing the Defect, by marketing its vehicles as safe, reliable, well-engineered, and of high quality, and by presenting itself as a reputable manufacturer that valued safety, performance and reliability, and stood behind its vehicles after they were sold, FCA violated California Civil Code § 1770(a), as it represented that the Class Vehicles and their Engines had characteristics and benefits that they do not have, and represented that the Class Vehicles and their Engine were of a particular standard, quality, or grade when they were of another. *See* Cal. Civ. Code §§1770(a)(5) & (7).

163. FCA knew that the Class Vehicles and their Engines suffered from an inherent defect, were defective and were not suitable for their intended use.

164. FCA also engaged in unlawful trade practices by employing deception, deceptive acts or practices, fraud, misrepresentations, or concealment, suppression, or omission of any material fact with intent that others rely upon such concealment, suppression or omission, in connection with the sale of the Class Vehicles.

165. FCA’s unfair and deceptive acts or practices occurred repeatedly in FCA’s trade or business, were capable of deceiving a substantial portion of the purchasing public and imposed a serious safety risk on the public.

166. FCA knew that the Class Vehicles suffered from an inherent defect, were defectively designed and/or manufactured, and were not suitable for their intended use.

167. As a result of their reliance on Defendant’s omissions, owners and/or lessees of the Class Vehicles, including California Plaintiff, suffered an ascertainable loss of money, property, and/or value of their Class Vehicles. Additionally, as a result of the Defect, Plaintiff, the California Class members and the CLRA Sub-Class members were harmed and suffered actual damages in that the Class Vehicles’ Engine and its components are substantially certain to fail before their expected useful life has run.

168. Defendant was under a duty to Plaintiff, the California Class members and the CLRA Sub-Class members to disclose the defective nature of the Class Vehicles because:

- a. Defendant was in a superior position to know the true state of facts about the safety defect in the Class Vehicles;
- b. Defendant made partial disclosures about the quality of the Class Vehicles without revealing the defective nature of the Class Vehicles; and
- c. Defendant actively concealed the defective nature of the Class Vehicles from Plaintiff, the California Class members and the CLRA Sub-Class members at the time of sale and thereafter.

169. By failing to disclose the Defect, Defendant knowingly and intentionally concealed material facts and breached its duty not to do so.

170. The facts concealed or not disclosed by Defendant to Plaintiff, the California Class members and the CLRA Sub-Class members are material because a reasonable person would have considered them to be important in deciding whether or not to purchase or lease Defendant's Class Vehicles, or to pay less for them. Whether a vehicle's engine with a defect in its valvetrain, which can cause the engine components to premature fail, resulting to decreased engine performance, loss of power, and eventual catastrophic engine failure is a material safety concern. Had Plaintiff, the California Class members and the CLRA Sub-Class members known that the Class Vehicles suffered from the Defect described herein, they would not have purchased or leased the Class Vehicles or would have paid less for them.

171. Plaintiff, the California Class members and the CLRA Sub-Class members are reasonable consumers who do not expect that their vehicles will suffer from the Defect. That is the reasonable and objective consumer expectation for vehicles.

172. As a result of Defendant's misconduct, Plaintiff, the California Class members and the CLRA Sub-Class members have been harmed and have suffered actual damages in that the Class Vehicles are defective and require repairs or replacement.

173. As a direct and proximate result of Defendant's unfair or deceptive acts or practices, Plaintiff, the California Class members and the CLRA Sub-Class members have suffered and will continue to suffer actual damages.

174. FCA's violations present a continuing risk to Plaintiff, the California Class members and the CLRA Sub-Class members as well as to the general public. FCA's unlawful acts and practices complained of herein affect the public interest.

175. Plaintiff, the California Class members and the CLRA Sub-Class members are entitled to equitable relief.

176. Plaintiff, the California Class members and the CLRA Sub-Class members seek to recover an order enjoining FCA's unfair or deceptive acts or practices and equitable relief under Cal. Civ. Code § 1780(e), and any other just and proper relief available under the CLRA.

177. In accordance with section 1782(a) of the CLRA, Plaintiff Grynich's counsel, via letter dated October 22, 2025, provided FCA with notice of its alleged violation of Cal. Civ. Code § 1770(a) relating to the Class Vehicles purchased by Plaintiff, the California Class members and the CLRA Sub-Class members, and demanded that FCA, within thirty (30) days of such notice, correct or agree to correct the actions described therein and agree to reimburse associated out-of-pocket costs. FCA failed to correct the actions describe herein, to reimburse associated out-of-pocket costs, provide appropriate relief for its violation of the CLRA, or otherwise remedy the harm alleged. Accordingly, Plaintiff seeks monetary, compensatory, and punitive damages, in addition to injunctive and equitable relief.

COUNT IV

Violation of the California Business & Professions Code § 17200, *et seq.*

(On Behalf of the California Class against Defendant)

178. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 166 above as if fully set forth herein.

179. Plaintiff brings this cause of action on behalf of himself and on behalf of the members of the California Class.

180. California Business & Professions Code § 17200 prohibits "unfair competition" including any "unlawful, unfair, or fraudulent business practice" and "unfair, deceptive, untrue or misleading advertising." FCA engaged in conduct that violated each of this statute's three prongs.

181. As a result of their reliance on Defendant's omissions, owners and/or lessees of the Class Vehicles, including Plaintiff, suffered an ascertainable loss of money, property, and/or value of their Class Vehicles. Additionally, as a result of the Defect, Plaintiff and the California Class members were harmed and suffered actual damages in that the Class Vehicles' Engine and its components are substantially certain to fail before their expected useful life has run.

182. Plaintiff and the California Class members are reasonable consumers who do not expect their engine to exhibit problems in its valvetrain, specifically the RFF and related components, such as the HLA, which cause those components to prematurely fail.

183. Defendant knew the Class Vehicles and their Engines were defectively designed or manufactured, would fail prematurely, and were not suitable for their intended use.

184. In failing to disclose the Defect, Defendant has knowingly and intentionally concealed material facts and breached its duty not to do so.

185. Defendant was under a duty to Plaintiff and the California Class Members to disclose the defective nature of the Class Vehicles because:

- a. Defendant was in a superior position to know the true state of facts about the safety defect in the Class Vehicles;
- b. Defendant made partial disclosures about the quality of the Class Vehicles without revealing the defective nature of the Class Vehicles; and
- c. Defendant actively concealed the defective nature of the Class Vehicles from Plaintiff and the California Sub-Class Members at the time of sale and thereafter.

186. By failing to disclose the Defect, Defendant knowingly and intentionally concealed material facts and breached its duty not to do so.

187. The facts concealed or not disclosed by Defendant to Plaintiff and the California Class Members are material because a reasonable person would have considered them to be important in deciding whether or not to purchase or lease Defendant's Class Vehicles, or to pay less for them. Whether a vehicle's engine with a defect in its valvetrain, which can cause the engine components to premature fail, resulting to decreased engine performance, loss of power, and eventual catastrophic engine failure is a material safety concern. Had Plaintiff and the California Class Members known

that the Class Vehicles suffered from the Defect described herein, they would not have purchased or leased the Class Vehicles or would have paid less for them.

188. Defendant continued to conceal the defective nature of the Class Vehicles and their Engine even after Plaintiff and the other California Class members began to report problems.

189. Defendant's conduct was and is likely to deceive consumers.

190. FCA's acts, conduct, and practices were unlawful, in that they constituted:

191. Violations of California's Consumers Legal Remedies Act;

192. By their conduct, FCA has engaged in unfair competition and unlawful, unfair, and fraudulent business practices.

193. FCA's unfair or deceptive acts or practices occurred repeatedly in FCA's trade or business and were capable of deceiving a substantial portion of the purchasing public.

194. As a direct and proximate result of FCA's unfair and deceptive practices, Plaintiff and the other California Class members have suffered and will continue to suffer actual damages.

195. Plaintiff and the other California Class members will be unable to rely on the advertising and labeling of Class Vehicles in the future, and so will not purchase the Class Vehicles although they would like to.

196. FCA should be required to make restitution to Plaintiff and the other California Class members pursuant to §§ 17203 and 17204 of the Business & Professions Code.

PRAYER FOR RELIEF

197. WHEREFORE, Plaintiff, individually and on behalf of the members of the California Class and CLRA Sub-Classes, respectfully requests that the Court certify the proposed California Class and CLRA Sub-Class including designating the named Plaintiff as representatives of the California Class, and the CLRA Sub-Class and appointing the undersigned as Class Counsel, and the designation of any appropriate issue classes, and that the Court enter judgment in Plaintiff's favor and against FCA including the following relief:

198. A declaration that any applicable statutes of limitations are tolled due to FCA's fraudulent concealment and that FCA is estopped from relying on any statutes of limitations in defense;

- i. Restitution, compensatory damages, and costs for economic loss and out-of-pocket costs;
- ii. Punitive and exemplary damages under applicable law;
- iii. Reimbursement and compensation of the full purchase price for any repairs or replacements purchased by a Plaintiff or Class member to remedy the Defect;
- iv. A determination that FCA is financially responsible for all Class notices and the administration of Class relief;
- v. Any applicable statutory or civil penalties;
- vi. An order requiring FCA to pay both pre-judgment and post-judgment interest on any amounts awarded;
- vii. An award of reasonable counsel fees, plus reimbursement of reasonable costs, expenses, and disbursements, including reasonable allowances for the fees of experts;
- viii. Leave to amend this Complaint to conform to the evidence produced in discovery and at trial; and
- ix. Any such other and further relief the Court deems just and equitable.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all issues so triable.

Dated: December 9, 2025

Respectfully submitted,

/s/Russell D. Paul

Russell D. Paul (Bar No. 4647)

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EXHIBIT 1

NHTSA ID Number: 11191060

Incident Date January 7, 2019

Consumer Location YEMASSEE, SC

Vehicle Identification Number 1C4RDHDG6EC****

Summary of Complaint

ROCKER ARM TICKING NOISE 3.6L V6. I BELIEVE THE SAME RECALL THAT WAS PUT INTO EFFECT FOR 2011 TO 2013 3.6 ENGINES BY DODGE SHOULD APPLY TO OTHER YEARS WITH THIS ENGINE. I'VE READ THAT THE 2014 ENGINE IS THE SAME AS 2011 TO 2013.

NHTSA ID Number: 11209978

Incident Date May 24, 2019

Consumer Location ORANGE, NJ

Vehicle Identification Number 1C4RDJAG6EC****

Summary of Complaint

MY VEHICLE STARTED MAKING A CLICKING NOISE AROUND 65K MILES. WHEN I SCHEDULED MY ROUTINE OIL CHANGE AT MY DEALERSHIP I WAS TOLD THAT I NEEDED TO HAVE MY CAM LIFTER AND ROCKER ARMS REPLACED. I EXPLAINED THAT THIS IS AN ISSUE THAT SHOULD NOT BE HAPPENING ON A VEHICLE THAT IS ONLY 5 YEARS OLD WITH 65K MILES. THEY TOLD ME THAT THIS IS GOING TO COST ME \$1,800 TO HAVE THE REPAIRS MADE TO THE VEHICLE. THEN I WAS TOLD THAT IF I HAVE THE 60K MILE CHECK UP FOR \$800 ON THE VEHICLE THAT DODGE WILL COMPLETE THE REPAIRS FOR FREE. AFTER DOING RESEARCH ONLINE AND SPEAKING WITH OTHER DURANGO OWNERS I FOUND THAT THIS IS A KNOWN ISSUE WITH THE 2014-2015 DODGE DURANGO AND SHOULD BE ADDRESSED.

NHTSA ID Number: 11252379

Incident Date August 1, 2019

Consumer Location DETROIT, MI

Vehicle Identification Number 1C4RDJAG2EC****

Summary of Complaint

IVE HAD A TOTAL OF SEVEN PROBLEMS WITH THIS VEHICLE RELATED TO THE ENGINE. NOW THERE IS A TIME KING SOUND WITH FULL OIL CHANGES ON THE PLAN EVERY THREEOMTHS. I TRHLY

BELIEVE THIS VEHICLE HAS ENGINE PROBLEMS WITH THE WAY ITS BUILT.

NHTSA ID Number: 11254887

Incident Date August 1, 2019

Consumer Location BEACON FALLS, CT

Vehicle Identification Number 1C4RDJDG3EC****

Summary of Complaint

TICKING NOISE FROM ENGINE. GETTING LOUDER WITH TIME AND WHEN ACCELERATING. VALVE LIFTER BAD. NEED TO BE REPLACED. TOLD IT IS FREQUENT PROBLEM BY DODGE DEALER FOR THESE MODELS.

NHTSA ID Number: 11299641

Incident Date January 10, 2020

Consumer Location ELBERTON, GA

Vehicle Identification Number 1C4RDHAG8EC****

Summary of Complaint

MECHANIC STATED IT WAS A BAD LIFTER IN ENGINE CAUSEING A TICKING SOUND. AFTER EXTENSIVE RESEARCH ABOUT THIS ISSUE, IT HAS SHOWN ME THAT THIS IS A RECURRING ISSUE WITH ALOT OF YOUR DURANGO MODELS AND ALOT OF COMPLAINTS ON THIS NOT BEING A RECALL ON THESE VEHICLES. MY COMPLAINT IS THAT I HAVE LESS THAN 88,000 MILES ON MY VEHICLE AND OTHERS WITH FAR LESS MILEAGE HAVING ENGINE TROUBLE AND DODGE/CHRYSLER WILL NOT RECALL AND FIX THIS PROBLEM.

NHTSA ID Number: 11309859

Incident Date February 18, 2020

Consumer Location NAVARRE, FL

Vehicle Identification Number 1C4RDHDG7EC****

Summary of Complaint

I WANTED TO ADD TO THE MOUNTING NUMBER OF NOISY LIFTER COMPLAINTS THAT ARE ON THE NHTSA WEBSITE. MY 2014 DURANGO HAD THE 100K MILE WARRANTY AND AT APPROX 96K STARTED HAVING LIFTER NOISE. DELEARSHIP WAS AWESOME (SANDY SANSING IN MILTON) WITH FIXING THE VEHICLE. NOW AT 122K

MILES I AM HAVING THE ISSUE AGAIN. NOT SURE IF THEY ARE GOING TO BE AWESOME A SECOND TIME. MY COMPLAINT IS THEY ONLY REPLACED MY #2 ROCKER AND LIFTER ALONG WITH THE EXHAUST CAM. THIS IS A KNOWN PROBLEM AND IT SHOULD HAVE ALL BEEN REPLACED. BUT I GET IT, YOU CANT MAKE MONEY THAT WAY. DODGE FIX YOUR PROBLEM PENTASTAR! OH YEAH DEALERSHIP PROVIDED A RENTAL AND EVERYTHING DURING MY WEEK LONG REPAIR.

NHTSA ID Number: 11322916

Incident Date March 2, 2020

Consumer Location HOUSTON, TX

Vehicle Identification Number 1C4RDHDG9EC****

Summary of Complaint

I'VE HAD THIS VEHICLE FOR ABOUT 5 YEARS, I BARELY HIT 40K AND I AM EXPERIENCING A LOT OF LIFTER NOISE. WITH ALL THE COMPLAINTS I AM SURPRISED THEY HAVE NOT RECALLED FOR THIS PURPOSE. WHEN IT'S STATIONARY THE SOUND IS A LOT LOUDER THAN WHEN THE VEHICLE IS IN MOTION.

NHTSA ID Number: 11328404

Incident Date June 8, 2020

Consumer Location GUYTON, GA

Vehicle Identification Number 1C4RDJEG1EC****

Summary of Complaint

WHEN CRANKING UP MY VEHICLE I HEARD A TICKING NOISE, AS I STARTED TO DRIVE THE NOISE BEGAN TO GET LOUDER. I TOOK MY VEHICLE TO THE MECHANIC WHO INFORMED ME THAT I HAVE A BAD LIFTER IN THE ENGINE IT WILL COST OVER \$2000 TO GET FIXED OR MORE. I ONLY HAVE 135,000 MILES ON MY DURANGO CITADEL THAT IS A 2014. I SHOULD NOT BE HAVING THIS TYPE OF ENGINE ISSUE THIS SOON. I AM HIGHLY UPSET ABOUT THIS ISSUE. *TR

NHTSA ID Number: 11348538

Incident Date February 21, 2020

Consumer Location SLOATSBURG, NY

Vehicle Identification Number 1C4RDJAG9EC****

Summary of Complaint

WHEN VEHICLE IS RUNNING IN PARK YOU CAN HEAR A CLICKING SOUND IN THE ENGINE. WHEN IN PARK AND YOU EXCELERATE THE GAS THE CLICKING SOUNDS GETS FASTER. WHEN IN DRIVE THE SAME THING HAPPENS. NO ACTUAL ISSUES WITH ENGINE YET, BUT WITH RESEARCH AND SPEAKING TO OTHER OWNERS OF THE SAME VEHICLE THEY HAVE HAD THE SAME ISSUE WITH HIGHER MILEAGE. RESEARCH AND BRINGING IT TO A MECHANIC HAS COME TO THE CONCLUSION OF A BAD CAM SHAFT AND ROCKERS. TOTAL PARTS AND LABOR WOULD TOTAL CLOSE TO \$2,000.

NHTSA ID Number: 11364576

Incident Date December 1, 2019

Consumer Location SWANSEA, MA

Vehicle Identification Number 1C4RDJEG4EC****

Summary of Complaint

TICKING NOISE WHEN ENGINE WAS RUNNING. MECHANIC WAS FAMILIAR WITH NOISE. STATED IT WAS A BAD ROCKER ARM.WHEN IT WAS TAKEN APART FOUND THAT THE BAD ROCKER HAD ALSO DAMAGED CAM SHAFT . ENDED UP REPLACING ALL ROCKERS AND CAMS AT A COST OF 2400.00. MECHANIC ALSO STATED THIS WAS A WELL KNOW ISSUE WITH THESE MOTORS

NHTSA ID Number: 11366623

Incident Date October 13, 2020

Consumer Location PEMBROKE PINES, FL

Vehicle Identification Number 1C4RDHDG9EC****

Summary of Complaint

TL* THE CONTACT OWNS A 2014 DODGE DURANGO. THE CONTACT STATED THAT AT START-UP THERE WAS AN ABNORMAL TAPPING SOUND COMING FROM THE ENGINE, WITHOUT WARNING. THE CONTACT STATED THAT THE VEHICLE WAS TAKEN TO SEVERAL INDEPENDENT MECHANICS WHO WERE UNABLE TO DIAGNOSE THE FAILURE. UPON INVESTIGATION, THE CONTACT DISCOVERED ONLINE BY OTHER DODGE DURANGO OWNERS THAT THE DEFECT WAS RELATED TO THE ENGINE LIFTERS. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE AND INFORMED THE CONTACT THAT THE VIN WAS NOT UNDER RECALL. THE CONTACT WAS PROVIDED A CASE

NUMBER AND TRANSFERRED TO NHTSA FOR ASSISTANCE. THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS UNKNOWN.

NHTSA ID Number: 11397020

Incident Date February 1, 2021

Consumer Location SYLVANIA, GA

Vehicle Identification Number 1C4RDHDGXEC****

Summary of Complaint

TL* THE CONTACT OWNS A 2014 DODGE DURANGO. THE CONTACT STATED THAT A TICKING NOISE OCCURRED COMING FROM THE ENGINE. THE ENGINE WARNING LIGHT ILLUMINATED. THE CONTACT ALSO STATED THAT THE ENGINE LIGHT WAS FLICKERING. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC AND WAS DIAGNOSED HOWEVER, THE MECHANIC WAS UNABLE TO DETERMINE WHERE THE TICKING NOISE WAS COMING FROM. THE MECHANIC INFORMED THE CONTACT THAT IT COULD BE THE LIFTER OF THE CYLINDER HEAD. THE CONTACT STATED THAT THE OXYGEN SENSOR, SPARK PLUGS, AND COIL PACKS WERE REPLACED. THE CONTACT CALLED JIMMY BRITT CHRYSLER JEEP DODGE RAM (12114 US-301 S, STATESBORO, GA 30458) AND INFORMED THE DEALER OF THE FAILURE, AND WAS INFORMED THAT THERE WOULD BE A FEE FOR DIAGNOSTIC TESTING. THE CONTACT WAS ALSO INFORMED BY THE DEALER THAT CHRYSLER HAD EXTENDED THE WARRANTY ON THE TICKING FAILURE HOWEVER, HER VEHICLE YEAR WAS NOT INCLUDED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS 156,000.

NHTSA ID Number: 11396889

Incident Date October 5, 2020

Consumer Location Unknown

Vehicle Identification Number 1C4RDJDG9EC****

Summary of Complaint

1. WHEN I WANT TO START MY CAR IT CRANKS MORE AND LONG AND DOES NOT START IN FIRST ATTEMPT, SECOND ATTEMPT IT STARTS. TOOK THE CAR TO THE DEALER THEY TOLD FUEL PUMP, AND WHEN THE PROBLEM STARTED ITS JUST ONLY 110000KMS. SEND THE MESSAGE TO FCA THEY DOES NOT CARE THEY TOLD THE CAR

FINISHED MANUFACTURER WARRANTY WE HAVE TO REPAIR AND ITS A KNOWN PROBLEM FOR THEM. FUNNY PART IS MY FRIEND ALSO TOOK THE SAME CAR SAME MODEL WITH ONE WEEK DIFFERENCE HE ALSO FACE THE SAME ISSUES ON SAME MONTH ON 2020 OCT I BELIVE. I ALREADY REPORTED BUT NO RESPONSE. THIS FUEL PUMP CAN CAUSE PROBLEM WHILE DRIVING ALSO IF PRESSURE FAILS AND NO SUPPLY OF FUEL THEN IT CAN CAUSE ACCIDENT. THE OTHER THING IS SOME OTHER MANUFACTURER FOR AMERICAN AND GERMAN CARS ALREADY CALLED FOR RECALL DUE TO FUEL PUMP ON JAN 2021, STILL FCA MANUFACTURER DOES NOT CARE THEY JUST IGNORE THE COMPLAINT AND ISSUE TELLING WARRANTY FINISH. 2. MY SECOND ISSUE HAPPEND WHEN AROUND 65000 LMS ENGINE IS GIVING NOISE TICKING, DEALER TOLD TAPPET ISSUE WARRANTY FINISHED CANT DO ANYTHING. U CAN DRIVE ITS JUST GIVE SOUND ONLY. NOW THE SOUND IS INCREASED AND I INFORMED MANUFACTURER THEY TOLD Y I DID NOT TELL BEFORE MY WARRANTY FOR CAR IS FINISHED, AND IF WE GO AND CHECK 2014 MODEL DURANGO THE PROBLEM OS COMMON AND THEY DONT WANT TO FIX THEY JUST WANT US TO PAY HUGE AMOUNT OF MONEY TO REPAIR OUR OWN, THEY KNOWS THEIR CAR HAVE THESE PROBLEMS AND THEY NEVER BOTHERED. ON MY VIEW THEY HAVE TO TAKE INITIATIVE TO RECALL TO FIX. IF U GO TO COMPLAINT FORUM THERE IS LOT LIKE THIS PROBLM. FCA JUST DONT CARE AFTER THEY SELL THEIR CAR AND WANT TO PAY HUGE AMOUNT OF MONEY AMD DOES NOT GIVE RELIABLE CAR. NHSTA HAVE TO INVOLVE AND TAKE ACTION. HOPE I WILL GET POSITIVE ACTION FROM NHSTA WHERE MANUFACTURER IGNORED.

NHTSA ID Number: 11403243

Incident Date March 16, 2021

Consumer Location RAMSEY, NJ

Vehicle Identification Number 1C4RDJDG9EC****

Summary of Complaint

2014 DODGE DURANGO, WITH 125,000. HAS RECENTLY REQUIRED REPLACEMENT OF THE OIL/COOLAND HOUSING, WHICH HAS A KNOWN DEFECT AND COST \$1800 (MEINEKE). NOW REQUIRES REPLACEMENT OF ROCKER/LIFTERS/CAM AT A COST OF \$4,200 (RAMSEY DODGE, CHRYSLER JEEP). BOTH REPAIRS ARE KNOWN DEFECTS, BUT NOT WARRANTIED OR SUBJECT TO RECALL BY

CHRYSLER DESPITE THESE WELL KNOWN ISSUES AND A RECENT LAWSUIT.

NHTSA ID Number: 11220794

Incident Date June 1, 2019

Consumer Location ASTORIA, NY

Vehicle Identification Number 1C4RDJDG2FC****

Summary of Complaint

I AM TIRED OF GOING TO THE DEALER ENGINE TICKING , CALIPERS FRONT MAKING NOISE , EXPERIENCED BUCKING , HESITATION DURING ACCELERATION, BACK OF TRUCK MAKING NOISE WHEN BACKING OUT OF DRIVE WAY , AC UNIT EVAPORATOR GONE BAD , CAM SHAFT AND ROCKETS WENT , I ONLY HAVE 40 THOUSAND MILES ON IT , AND I BABY THE TRUCK .. WHAT IS GOING ON WITH THIS MODEL???? EVERY TIME I GOT IT THE DEALER SOMETHING ELSE GOES BAD...THE VEHICLE HAS TROUBLE ADJUSTING TO BAROMETER CHANGES , SUN ROOF LEAKED WATER TWICE DURING A STORM INTO MY SUNGLASSES HOLDER.. CALIPERS SQUEAK AND PIN STUCK LEFT FRONT CALIPER , SOMETHING HAS TO BE DONE I CAN'T KEEP GOING TO THE DEALER PLEASE IS THIS TRUCK A LEMON?

NHTSA ID Number: 11353755

Incident Date September 2, 2020

Consumer Location KOSCIUSKO, MS

Vehicle Identification Number 1C4RDHAGXFC****

Summary of Complaint

MY ENGINE HAS STARTED MAKING A TICKING NOISE. I GOT ONLINE AND DID SOME RESEARCH AND THIS IS A WELL KNOWN ISSUE FOR THIS ENGINE. WHY HAS THERE NOT BEEN SOME SORT OF RECALL IF THIS IS COMMON?

NHTSA ID Number: 11361315

Incident Date August 4, 2020

Consumer Location STROUDSBURG, PA

Vehicle Identification Number 1C4RDJDG8FC****

Summary of Complaint

ROCKER ARMS OR LIFTERS CAUSING 'TICKING NOISE/ SOUND' AT 113,000 MILES. AFTER ONLINE RESEARCH, MANY DODGE DURANGO 2014 AND LATER MODELS HAVE SAME ISSUE.

NHTSA ID Number: 11363918

Incident Date October 1, 2020

Consumer Location AMARILLO, TX

Vehicle Identification Number 1C4RDJDGXFC****

Summary of Complaint

I AM AT 92,000 MILES AND I HAVE A TICKING SOUND IN MY ENGINE. WHILE JUST IN PARK YOU CAN HEAR THE TICKING SOUND AS WELL AS WHEN YOU EXCEL WHILE DRIVING. I DO MY OIL CHANGES EVERY 3,000 MILES AND I SEEN THIS IS AN ISSUES ON A LOT OF OTHER DODGE DURANGO MODELS. SHOULD THIS ME A RECALL WITH THIS HAPPENING TO SO MANY?

NHTSA ID Number: 11376274

Incident Date November 20, 2020

Consumer Location ALEXANDRIA, VA

Vehicle Identification Number 1C4RDJEG7FC****

Summary of Complaint

I HEARD A TICKING NOISE COMING FROM THE RIGHT SIDE OF THE ENGINE. TOOK IT TO FARRISH OF FAIRFAX, VA (703-273-0200) DEALERSHIP AND THEY DID THE FOLLOWING, "REMOVED VALVE COVER AND INSPECT VALVE TRAIN. FOUND WORN OUT ROCKERS ON CYLINDER #5 INTAKE. CAMSHAFT LOBE ALSO WORN OUT. REPLACED RIGHT BANK INTAKE CAMSHAFT." AT THE CURRENT LEVEL, WE DID NOT NOTICE ANY DRIVABILITY ISSUES AND FUEL MILEAGE APPEARED TO BE NORMAL. WE COULDN'T EVEN HEAR THE TICKING FROM INSIDE THE CAR WITH THE WINDOWS UP AND RADIO OFF. WE COULD ONLY HEAR IT FORM OUTSIDE THE VEHICLE. THIS APPEARS TO BE A COMMON ISSUE. THE MECHANIC KNEW EXACTLY WHAT IT WAS WHEN I TOLD HIM WE HAD A TICKING NOISE IN A DURANGO. I DIDN'T TELL HIM THE ENGINE AND HE CAME BACK WITH "IF IT'S A 3.6 MOTOR PROBABLY A WORN OUT CAMSHAFT CAUSED BY ROCKER ARM ROLLER BEARINGS WEARING OUT PREMATURELY. BRING IT ON IN." HERE'S TWO LINKS TO A SIMILAR OWNERS' EXPERIENCES: [HTTPS://WWW.YOUTUBE.COM/WATCH?V=2DPHCJLDSW4](https://www.youtube.com/watch?v=2DPHCJLDSW4)

[HTTPS://WWW.YOUTUBE.COM/WATCH?V=JZIF0GC4BGI](https://www.youtube.com/watch?v=JZIF0GC4BGI) WE ONLY HAD 49,237 MILES ON THE VEHICLE, BUT WERE JUST OUT OF THE 5 YEAR/100,000 MILE POWERTRAIN WARRANTY. DEALERSHIP DID COVER COST OF REPAIR.

NHTSA ID Number: 11435319

Incident Date September 24, 2021

Consumer Location BALDWIN PARK, CA

Vehicle Identification Number 1C4RDHAG6FC****

Summary of Complaint

There is a ticking sound coming from my engine. The dealer told me I need to replace my rocker arms. I've search and seen a lot of people having this problem with the rocker arms failing in the engine. If "a lot" of people are having this problem it sounds to me like a part defect by the manufacturer...

NHTSA ID Number: 11341406

Incident Date June 1, 2018

Consumer Location MCALLEN, TX

Vehicle Identification Number 1C4RDHAG6GC****

Summary of Complaint

CRASHNo

FIRENo

INJURIES0

DEATHS0

ON 06/2018 I CAME HOME AND PULLED INTO OUR DRIVEWAY. I PUT OUR DODGE DURANGO 2016 WITH 21110 MILES IN THE PARK POSITION AND I THEN OPENED OUR GARAGE DOOR HALFWAY OPEN. I WALKED UNDER THE DOOR AND WENT INTO THE HOUSE TO GET MY WALLET OUT OF MY PANTS WHICH I WAS WEARING EARLIER. IT WAS A COUPLE MINUTES LATER WHEN MY WIFE AND I HEARD A BIG BANG. WE BOTH RAN OUT TO THE GARAGE AND SAW THE 2016 DODGE DURANGO SUV HALFWAY INTO THE GARAGE. THE GARAGE DOOR WAS STOPPING THE SUV FROM GAINING SPEED AND COMING INTO THE HOUSE. IT DAMAGE OUR GARAGE DOOR SIGNIFICANTLY AND PUT SCRATCHES ON OUR SUV HOOD AND WINDSHIELD. LUCKILY THE GARAGE DOOR STOPPED IT OTHERWISE IT WOULD'VE BROKEN DOWN THE WALL AND COULD'VE RAN OVER ONE OF OUR CHILDREN OR US OR DONE SO MUCH DAMAGE. MY GARAGE DOOR IS

DAMAGED IN OUR SUV IS SCRATCHED UP AND FORTUNATELY IT'S NOT OUR LIFE THAT WAS HURT. AS FAR AS THE ENGINE IS CONCERNED WITH YOU A KNOCKING WHEN WE PRESS THE GAS AT FIRST. BETWEEN FIRST AND SECOND GEAR. SOUND LIKE A LIFTER IS GOING OR ARE BAD

NHTSA ID Number: 11143719

Incident Date August 31, 2018

Consumer Location DORAL, FL

Vehicle Identification Number 1C4AJWAG2EL****

Summary of Complaint

MY CAR RECENTLY STARTED A TICKING NOISE THAT WILL NOT GO AWAY. TICKING INCREASES WHILE VEHICLE ACCELERATES.

NHTSA ID Number: 11183319

Incident Date February 28, 2019

Consumer Location NORTH RIVERSIDE, IL

Vehicle Identification Number 1C4AJWBG2EL****

Summary of Complaint

I HAVE THE 2014 JEEP WRANGLER WITH ONLY 47000 MILES. I HAVE KEPT EXCELLENT CARE OF THIS VEHICLE AND IT IS USED ONLY AS DAILY DRIVER WITH NO ABUSE WHATSOEVER. JUST WITHIN THE MONTH OF 2/2019 A CODE; P0305 MISFIRE DEVELOPED WITH THE TYPICAL PENASTAR ENGINE "KNOCK" AND IDLING ROUGH. ALSO, THE LAST WEEK OF 2/2019 THERE WAS A LARGE OIL SPOT ON MY GARAGE FLOOR DUE TO AN OIL COOLER/OIL HOUSING LEAK. WE IMMEDIATELY CONTACTED THE SERVICE SUPERVISOR AT THE DEALERSHIP WHO STATED THAT THIS HAS BEEN A COMMON OCCURANCE AND THE OIL COOLER/HOUSING UNIT IS REPLACED OFTEN. HOW IT IS POSSIBLE THAT CHRYSLER CAN ALLOW THIS? AT 47000 MILES THIS SHOULD NEVER HAPPEN AND IS ENEXCEPTABLE. UNTIL THIS EXTENSIVE REPAIR IS COMPLETED THE VEHICLE IS RENDERED USELESS AND MY JOB IS NOW INTERRUPTED. NOW IN ADDITION TO THE MISFIRE I NOW HAVE THIS HUGE OIL LEAK TO CONTEND WITH; PLEASE REFER TO THE PICTURE ATTACHED OF THE OIL STAIN THAT WAS DISCOVERED ON MY GARAGE FLOOR.... THE ENTIRE BOTTOM OF THE OF MY TRANSMISSION/BELL HOUSING AND CROSS MEMBER COVERED IN

OIL. MOREOVER I JUST RECEIVED AN LETTER INFORMING ME THAT THE PASSENGER SIDE AIR BAG ALSO IS RECALLED AND I HAVE YET TO ADDRESS THIS AS WELL. I WILL NEVER PURCHASE ANOTHER CHRYSLER PRODUCT AGAIN. I CAN'T TELL YOU THE LEVEL OF DISAPPOINTMENT AND BETRAYAL I FEEL FOR BUYING AN "AMERICAN MADE" CAR. I HOPE CHRYSLER/FIAT CORPERATE IS ENJOYING SHORT CHANGING THE CONSUMER BUY USING INFERIOR AND FAULTY PARTS TO SAVE MONEY AND RIP OFF THE CONSUMER THIS WAY. I AM SURE NO ONE CARES AND I AM JUST WASTING MY TIME BUT THIS SHOULD BE NOTED AND PEOPLE MADE AWARE.

NHTSA ID Number: 11221978

Incident Date June 16, 2019

Consumer Location NEWNAN, GA

Vehicle Identification Number 1C4BJWDG4EL****

Summary of Complaint

ENGINE STARTED TICKING SOUNDS LIKE A VALVE OR LIFTER

NHTSA ID Number: 11229371

Incident Date June 1, 2019

Consumer Location NEWNAN, GA

Vehicle Identification Number 1C4BJWDG4EL****

Summary of Complaint

3.6 TICKING NOISE SOUNDS LIKE LIFTERS OR ROCKERS

NHTSA ID Number: 11287817

Incident Date October 13, 2019

Consumer Location FREMONT, CA

Vehicle Identification Number 1C4BJWDG7EL****

Summary of Complaint

TICKING NOISE FROM THE ENGINE ON BOTH DRIVER AND PASSENGER SIDES. THE NOISE BECOMES LOUDER WHEN THE ENGINE GETS WARM, ESPECIALLY WHEN IT IS CLOSE TO A WALL OR OTHER VEHICLES. DIAGNOSTIC FROM DEALERSHIP SAYS IT IS DUE TO ROCKER ARM FAILURES.

NHTSA ID Number: 11288067

Incident Date December 5, 2019

Consumer Location MINERSVILLE, PA

Vehicle Identification Number 1C4AJWAG1EL****

Summary of Complaint

NO OIL PRESSURE AND CHECK ENGINE LIGHT ON, NOISE FROM THE ENGINE LIFTERS KNOCKING NOW THE DEALER SHOWS ME DIRT ON THE INTAKE MANIFOLD COVER AND THAT IS WHY THE ENGINE SEIZED. THE OIL SENSOR NOT WORKING I SAID.

NHTSA ID Number: 11324267

Incident Date May 1, 2020

Consumer Location CHESTER, VA

Vehicle Identification Number 1C4BJWEG1EL****

Summary of Complaint

TICKING NOISES WHEN VEHICLE IN MOTION FOR HIGHWAY DRIVING AND CITY DRIVING. LEFT CYLINDER HEAD CRACKS. *TR

NHTSA ID Number: 11330608

Incident Date April 15, 2020

Consumer Location CAYEY, PR

Vehicle Identification Number 1C4BJWDG2EL****

Summary of Complaint

THE LIFTERS ARE SOUNDING AND CAN CAUSE THE ENGINE TO MALFUNCTION OR STOP WORKING ALL TOGETHER. I KNOW OF 2 OTHER PEOPLE CLOSE TO ME THAT THIS IS HAPPENING TO ALSO. *TR

NHTSA ID Number: 11338760

Incident Date January 5, 2019

Consumer Location WINTER HAVEN, FL

Vehicle Identification Number 1C4AJWAG8EL****

Summary of Complaint

MOTOR HAS A CONSTANT TIC SEEMS TO BE GETTING LOUDER AS TIME GOES ON

NHTSA ID Number: 11340614

Incident Date March 1, 2020

Consumer Location SWEETWATER, TN

Vehicle Identification Number 1C4BJWEG2EL****

Summary of Complaint

WHEN MY 2014 JEEP WRANGLER JKU IS RUNNING, THERE IS A LOUD ENGINE TICKING NOISE THAT IS COMING FROM THE DRIVER'S SIDE OF THE ENGINE. IT IS A LIFTER THAT NEEDS TO BE REPLACED AS WELL AS THE CAM. THE JEEP RUNS FINE, BUT THE NOISE IS TROUBLING. IT'S A COSTLY REPAIR!

NHTSA ID Number: 11343027

Incident Date August 1, 2020

Consumer Location SARASOTA, FL

Vehicle Identification Number 1C4BJWEG7EL****

Summary of Complaint

LOUD TICKING FROM THE LEFT SIDE OF ENGINE. A KNOWN PROBLEM WITH MANY MODEL YEARS OF JEEPS. I WAS TOLD I DO NOT HAVE THE WARRANTY ANY LONGER BECAUSE MY WARRANTY FOR THE VEHICLE STARTED IN 2013. IF I DID, THIS KNOWN ISSUE WOULD NOT BE COVERED. SHOP WANTED 3K DOLLARS TO REPAIR. SOUND HAPPENS WITH CAR RUNNING ALL THE TIME IN DRIVE OR JUST IDLE. GETS LOUDER AS I ACCELERATE.

NHTSA ID Number: 11363061

Incident Date October 1, 2020

Consumer Location FORT HOOD, TX

Vehicle Identification Number 1C4BJWDG2EL****

Summary of Complaint

VEHICLE ONLY HAS ABOUT 66K MILES AND AFTER A NEW OIL CHANGE, I COULD HEAR A TICKING NOISE COMING FROM THE ENGINE BAY. AFTER TAKING IT TO A MECHANIC AND RESEARCHING FOR SIMILAR ISSUES FROM OTHER JEEP OWNERS. IT SEEMS THE 3.6L PENTASTAR ENGINE IS NOTORIOUS FOR HAVING A CAMSHAFT OR LIFTER GO BAD

NHTSA ID Number: 11374831

Incident Date November 2, 2020

Consumer Location METAIRIE, LA

Vehicle Identification Number 1C4NJWTG2EL****

Summary of Complaint

I ONLY HAVE 56,000 MILES ON MY 2014 JEEP RUBICON UNLIMITED AND THE MOTOR IS ALREADY MAKING A TICKING NOISE.. NOT ONLY DO I CHANGE MY OIL AT THE RECOMMENDED MILEAGE I ALSO BUY THE MOST EXPENSIVE AND THE BEST OIL SO I WOULDN'T HAVE TO DEAL WITH SOMETHING LIKE THIS.

NHTSA ID Number: 11377445

Incident Date April 9, 2020

Consumer Location FALMOUTH, MA

Vehicle Identification Number 1C4BJWDG4EL****

Summary of Complaint

I PURCHASED A 2014 JEEP WRANGLER UNLIMITED WITH THE 3.6 LITER PENTASTAR ENGINE. I BOUGHT IT WITH 75K MILES. AFTER DRIVING ABOUT 500 MILES, THERE WAS A VERY LOUD TICKING NOISE COMING FROM THE LEFT SIDE OF THE ENGINE. I CONTACTED THE LOCAL JEEP DEALER AND WAS TOLD THAT THIS IS A VERY COMMON PROBLEM AND SAID THE REPAIRS START AT \$2,200. I DID SOME RESEARCH ON THE INTERNET PERTAINING TO THIS TICKING AND NUMEROUS VIDEOS ON YOUTUBE SHOWING HOW TO REPAIR THE LIFTER NOISE. THIS IS A KNOWN PROBLEM AND I FEEL CHRYSLER SHOULD MAKE THE FIX

NHTSA ID Number: 11385998

Incident Date December 1, 2020

Consumer Location PALM HARBOR, FL

Vehicle Identification Number 1C4BJWDG8EL****

Summary of Complaint

DEFECTIVE BEARING IN ROCKER ARM LEADING TO ENGINE FAILURE. IT IS A COMMON PROBLEM WITH THE ENGINE ON THESE VEHICLES. WHEN ENGINE FAILURE OCCURS, THERE IS LOSS OF POWER STEERING, PROPULSION, AND DIFFICULT BRAKING.

NHTSA ID Number: 11396200

Incident Date July 10, 2019

Consumer Location SPRINGVILLE, AL

Vehicle Identification Number 1C4BJWKGXEL****

Summary of Complaint

ROCKER ARMS WERE REPLACED AT 88,000 MILES AND NOW AT 110,000 THEY NEED REPLACED AGAIN. OIL CHANGES DONE AT EVERY 3000 MILES DUE TO DUSTY CONDITIONS ON MAIL ROUTE. VERY FRUSTRATING SEVERAL CO-WORKERS HAVE SAME COMPLAINT AS THESE VEHICLES ARE GREAT FOR THE JOB THEY ARE BUILT FOR . THIS EXPENSE SHOULD NOT BE A FACTOR IN CONSIDERING THESE VEHICLES FOR PURCHASE TO WORK AT THIS JOB..

NHTSA ID Number: 11432988

Incident Date September 14, 2021

Consumer Location FRUITA, CO

Vehicle Identification Number 1c4bjwfg8el****

Summary of Complaint

Issue with lifters ticking at 49k miles

NHTSA ID Number: 11271324

Incident Date October 26, 2019

Consumer Location TAMPA, FL

Vehicle Identification Number 1C4AJWAG5FL****

Summary of Complaint

AT APPROXIMATELY 12K MILES I NOTICED THAT WHEN THE VEHICLE WAS STARTED AND MOVED FROM THE STREET TO THE DRIVEWAY AND TURNED OFF BEFORE IT COULD REACH NORMAL OPERATING TEMPERATURE, UPON RESTART, THERE WOULD BE A PUFF OF BLUE SMOKE FROM THE EXHAUST. THE DEALERSHIP INVESTIGATED AND SAID THAT THEY COULD NOT DUPLICATE THE ISSUE. AT 20,500 MILES THE VEHICLE WAS RUNNING POORLY AND THE CHECK ENGINE LIGHT CAME ON. THE DEALERSHIP SAID A FUEL INJECTOR HAD GONE BAD AND THEY ALSO FOUND 3 BAD ENGINE ROCKER ARMS. THE ROCKER ARMS WERE REPLACED UNDER WARRANTY. INCIDENTALLY, THE ISSUE WITH THE BLUE SMOKE FROM THE EXHAUST DISAPPEARED. AT 28,000 MILES THE ENGINE WAS BEGINNING TO DEVELOP AN AUDIBLE TICKING NOISE. THE DEALERSHIP INVESTIGATED AND THIS TIME REPLACED 4 BAD ROCKER ARMS. AT LEAST 1 OF THE ROCKER ARMS WAS THE SAME

ONE (#1 INTAKE) THAT HAD BEEN REPLACED DURING THE PRIOR SERVICING.

NHTSA ID Number: 11300162

Incident Date October 24, 2019

Consumer Location MIDDLETOWN, DE

Vehicle Identification Number 1C4GJWBG1FL****

Summary of Complaint

PURCHASED 6/26/19 W/ 49K MI; TAPPING NOISE DEVELOPS AT 54K; PERSONAL, HIGHLY QUALIFIED/EXPERIENCE MECHANIC REFERRED ME TO DEALER - TAP WAS ENGINE ISSUE. ON 10/14/19 DEALER REPLACED LIFTERS/CAMS/ROCKERS (WARRANTY UNTIL 10/20/19). NOT NORMAL ON VEHICLE W/ ONLY 55K. DEALER AWARE OF CYLINDER MISFIRES ON JKs BUT DID NO DIAGNOSTIC TEST TO DETERMINE WHY LIFTERS/CAMS/ROCKERS FAILED; DID NOT PERFORM INSPECTION. TEN DAYS LATER, CEL WITH P0302 (#2 MISFIRE). REPLACED PLUGS; COIL CODE DID NOT CLEAR. RETURN TO DEALER WHO STATED WORK WAS NOT RELATED TO PREVIOUS WORK THEY JUST COMPLETED AND ACKNOWLEDGED MISFIRE IS A COMMON PROBLEM THEY ROUTINELY IN WRANGLERS THEY SERVICE. DEALER ALSO STATED THE 2011-2013 TSB EXTENDED WARRANTY ALSO APPLIED BEYOND THOSE MODEL YEARS TO OTHER ENGINES FROM SPECIFIC PRODUCTION RUNS BUT WOULD NOT PROVIDE INFO. FILED COMPLAINT WITH JEEP CUST CARE WHO SAID SAME - NOT UNDER WARRANTY, REFERRED ME BACK TO DEALER. NOT ASKING JEEP TO REPAIR ENGINE WITH EXCESSIVE MILEAGE OR WEAR - I AM ASKING JEEP TO EXTEND SAME COVERAGE AS 2011-2013 BECAUSE JEEP HAS NOT CORRECTED THE PROBLEM. NO ENGINE WITH 55K MILES SHOULD NEED THE EXTENT OF ENGINE WORK I'VE HAD DONE WITH LOW MILEAGE. THERE ARE NUMEROUS DOCUMENTED COMPLAINTS OF MISFIRE FOR WRANGLER AND CLASS ACTION SUIT FILED FOR PENTASTAR ENGINE DEFECTS.

NHTSA ID Number: 11309889

Incident Date February 4, 2020

Consumer Location WINTER PARK, FL

Vehicle Identification Number 1C4AJWAG1FL****

Summary of Complaint

AT 41,900 MILES A NOTICEABLE CLICKING/TAPPING NOISE ANYTIME THE ENGINE ON. IT CAME ON SUDDENLY AND WHEN MECHANIC HEARD IT HE THOUGHT ROCKER ARMS OR LIFTERS HAVE FAILED . HAD DIAGNOSTIC AND MECHANIC FOUND 2 ROCKER ARMS WERE BAD . THANKFULLY CAMS WITHOUT DAMAGE PER MECHANIC LIKELY DUE TO SEEKING REPAIRS SO QUICKLY

NHTSA ID Number: 11326259

Incident Date May 27, 2020

Consumer Location PASS CHRISTIAN, MS

Vehicle Identification Number 1C4BJWEG7FL****

Summary of Complaint

FIRST OWNER OF VEHICLE. ISSUES BEGAN WITH ENGINE LIGHT APPEARING/BLINKING & VEHICLE STRUGGLING TO RUN WITHIN 15K MILES. DEALERSHIP DIAGNOSED AS CYLINDER MISFIRE & REPAIRED. HAS OCCURRED MULTIPLE TIMES OVER LIFE OF OWNERSHIP- ALWAYS DIAGNOSES AS MISFIRES. AT APX 75K MILES, UPON CRANKING & DURING OPERATION, HEATER BECAME INCONSISTENT IN OPERATION & THIS IS STILL AN ISSUE. AT APX 80K MILES, UPON CRANKING & DURING OPERATION, TICKING NOISE FROM FRONT PASSENGER SIDE BEGAN. FAINT AT FIRST & BECAME INCREASINGLY LOUDER WITHIN SEVERAL DAYS. OUT OF WARRANTY. SOLID CHECK ENGINE LIGHT BEGAN TO APPEAR OFF/ON, REMAINING ON FOR 24-48HRS THEN OFF 24-48HRS. AIR CONDITIONER CONDITIONER HAS ABOUT A 15 SEC DELAY BEFORE IT TURNS ON AT EVERY CRANK & POWER LIGHT FOR A/C SLOWLY BLINKS UNTIL AFTER THE DELAYED START. MECHANIC FOUND 2 ROCKER HEADS DAMAGED & THEY WERE REPLACED. LIGHT NOT ON AT REPAIR & CODE COULD NOT BE PULLED. WITHIN 2 DAYS OF REPAIR, A FAINT TICKING NOISE BECAME PRESENT ON DRIVERS SIDE. HAS BEEN A WEEK & TICKING IS NOW EXTREMELY LOUD. I AM ONE OF MANY WITH PARALLEL ISSUES & REQUEST THIS BE ADDRESSED AS MY YEAR & VIN DO NOT FALL IN TO THE APPROVED EXTENDED WARRANTY TO COVER THESE VERY SAME ISSUES. *TR

NHTSA ID Number: 11372504

Incident Date October 1, 2020

Consumer Location BRONX, NY

Vehicle Identification Number 1C4BJWDG8FL****

Summary of Complaint

ARM ROCKERS IN THE INJUN CONSTANTLY HAVE TO BE REPLACED. GIVING THE INJUN A KNOCKING SONG.

NHTSA ID Number: 11386301

Incident Date October 25, 2020

Consumer Location MILLIS, MA

Vehicle Identification Number 1C4BJWDG7FL****

Summary of Complaint

I GET FREQUENT OIL CHANGES AND I NOTICED THAT THE LAST TWO OIL CHANGES IT STARTED MAKING THIS TICKING NOISE. I BROUGHT IT TO MY MECHANIC AND HE TOLD ME THAT AFTER THE NEXT FEW OIL CHANGES IT SHOULD GO AWAY. THAN MY OTHER MECHANIC THAT HEARD THIS TICKING NOISE SAID THAT IT WAS SERIOUS AND THIS HAS SOMETHING TO DO WITH AN ENGINE PART CALLED A LIFTER. I NERVOUS WHEN HE TOLD ME THAT IF IT'S NOT FIXED THE ENGINE COULD SEIZE. I JUST BOUGHT THIS JEEP FROM A DEALER NOT KNOWING THIS WAS A COMMON PROBLEM AMONG WRANGLERS. I DID MY RESEARCH AND CAME TO THE CONCLUSION THAT IT HAS NOTHING TO DO WITH THE MILEAGE BUT MORE SO ON HOW THE ENGINE WAS BUILT. I SPOKE TO NUMBER OF DEALERSHIPS AND THEY FIX THIS COMMON PROBLEM ON ALL AGES AND MILEAGE WRANGLERS. THE ESTIMATED COST OF REPAIR WOULD RANGE FROM \$2000 AND UP. I DON'T THINK WE AS CONSUMERS OF THIS PRODUCT SHOULD BE REPAIRING AN ENGINE PROBLEM FROM CHRYSLER. I DON'T HAVE ANY PICTURES YET TIL THE DEALERSHIP OPENS UP THE ENGINE

NHTSA ID Number: 11403890

Incident Date February 25, 2021

Consumer Location MYRTLE BEACH, SC

Vehicle Identification Number 1C4BJWEG2FL****

Summary of Complaint

CEL ON SCAN FOR CODE P0302 CYLINDER 2MISFIRE. R&R SPARK PLUGS, IGNITION COIL, AIR FILTER, UPPER INTAKE GASKET & CLEAN THROTTLE BODY. PERFORM UPPER INDUCTION CLEANING. FOUND MISFIRE TO RETURN ONLY ON IDLE ON CYLINDER 2. PERFORM

COMPRESSION TEST. COMPRESSION SPEC OK. REPLACED PLUGS AND COIL AGAIN. THERE IS A SLIGHT TICK FROM CYLINDER 2 VALVE TRAIN AREA. RECOMMEND GOING TO DEALER. DEALER: ENGINE DOES HAVE A SLIGHT TICK. PERFORMED A COMPRESSION TEST AND LEAK DIWN TEST. FOUND LIW COMPRESSION AND AN 80% LEAK ON THE EXHAUST SIDE OF CYLINDER 2. REMOVED THE CYLINDER HEAD AND FOUND THE EXHAUST VALVES BURNT AND EXCESSIVE PLAY IN THE VALVE GUIDES. REPLACED THE LEFT CYLINDER HEAD, ROCKER ARMS AND LIFTERS. CLEARED CODES AND ROAD TESTED VEHICLE. MISFIRE NO LONGER PRESENT. THIS IS ON A 2015 WRANGLER SAHARA UNLIMITED WITH ONLY 51,892 MILES

NHTSA ID Number: 11404629

Incident Date January 27, 2021

Consumer Location FREDERICK, MD

Vehicle Identification Number 1C4HJWEG6FL****

Summary of Complaint

NOTICED SIGNIFICANT KNOCKING NOISE COMING FROM ENGINE THAT CONTINUED TO GET LOUDER. TOOK TO DEALER FOR A NICE 2 THOUSAND DOLLAR FIX. DEALER REPLACED RIGHT SIDE LIFTERS, ROCKER ARMS, AND BOTH CAM SHAFTS. THIS SOUNDS WAY TOO MUCH LIKE THE 2011-2013 ISSUE THAT JEEP "FIXED" AND WAS UNDER WARRANTY FOR THOSE IT SOUNDS LIKE. VERY COINCIDENTAL AND I AM NOT THE ONLY ONE WITH THESE ISSUES BASED ON JEEP FORUMS

NHTSA ID Number: 11415187

Incident Date April 28, 2021

Consumer Location PACIFIC PALISADES, CA

Vehicle Identification Number 1C4BJWEG1FL****

Summary of Complaint

APOLOGIES IF THIS COMPLAINT IS A REPEAT, BUT I KEEP GETTING A SUBMISSION ERROR NOTICE WHENEVER I TRY TO SUBMIT THIS FORM. THE JEEP 4.0 LITER SIX CYLINDER ENGINE HAS A KNOWN DEFECT WITH RESPECT TO THE ROCKER ARM BEARINGS THAT CAUSES A LOUD TICKING NOISE IN THE ENGINE AND FAILURE OF THE EXHAUST AND INTAKE CAMSHAFTS. THIS HAPPENED TO OUR 2015 JEEP IN JANUARY 2020 WHEN IT HAD ONLY 31,000 MILES BUT WAS ONE MONTH OUT OF WARRANTY. CHRYSLER DID FIX IT AT

THAT TIME AS A COURTESY SUBJECT TO A \$100 FEE, AND A COPY OF THE INVOICE FOR THAT REPAIR IS PROVIDED. UNFORTUNATELY, A LITTLE OVER ONE YEAR LATER, AND WITH LESS THAN 10,000 MILES HAVING BEEN DRIVEN SINCE THE INITIAL REPAIR, THE SAME PROBLEM HAS REAPPEARED. THE DEALER IS NOW CLAIMING THE PROBLEM IS WITH THE REMAINING ROCKERS THAT WERE NOT REPLACED, AS IT IS CHRYSLER'S POLICY TO ONLY REPLACE THE ROCKER ARMS AND CAMSHAFTS THAT ARE DAMAGED AT THAT TIME. THE SERVICE MANAGER AT THE DEALER SAYS THAT THEY "SEE THIS ALL THE TIME" AND THAT THEY TRY TO GET ALL THE ROCKER ARMS REPLACED WHEN DOING ANY REPAIRS, BUT CHRYSLER DOES NOT ALLOW THEM TO DO SO. OF COURSE, CHRYSLER IS NOW REFUSING TO COVER THE REPAIRS, EVEN THOUGH THIS IS A KNOWN PROBLEM AND SHOULD HAVE BEEN FIXED THE FIRST TIME. THIS IS TOTALLY UNACCEPTABLE, AND CHRYSLER SHOULD BE FORCED TO DO A FULL RECALL OF ALL AFFECTED ENGINES AND PAY FOR ALL REQUIRED REPAIRS. THERE ARE THOUSANDS OF COMPLAINTS ABOUT THIS PROBLEM ONLINE, YET CHRYSLER STILL REFUSES TO CORRECT THIS PROBLEM.

NHTSA ID Number: 11421668

Incident Date June 13, 2021

Consumer Location HOLLYWOOD, FL

Vehicle Identification Number 1C4AJWAG8FL****

Summary of Complaint

I have a 2015 Jeep Wrangler with the Fiat Chrysler's 3.6 liter V- 6 Pentastar engine. The Jeep has only 44,465 miles on it and now has apparent design and manufacturing defects on the engine's left side , its the Pentastar Tick. The Tick Tick Tick is very loud and the engine will shudder, its only a matter of time before the engine shuts off on the highway when I am driving causing an accident. My dealer Hollywood Chrysler Jeep estimated repairs - need left side cams and full set of rockers - oil filter housing is leaking replace - replace abs sensor - coolant flush - carbon fuel cleaning -fluids service total \$6,000.07 invoice # 584685. It looks like the cylinder head, gasket, cams, lifters and rockers need to be replaced. Chrysler needs to disclose these defects. Yes my jeep is available for inspection.

NHTSA ID Number: 11437248

Incident Date October 8, 2021

Consumer Location SCOTTSDALE, AZ

Vehicle Identification Number 1C4BJWFG7FL****

Summary of Complaint

My 2015 Jeep Wrangler with 80,200 developed the well know Pentastar Tick. The Jeep would misfire at idle when slowing to a stop light. The check engine light came on and the code was a P0304. I'm the original owner and took it to the dealer I purchased it from. They diagnosed the issue and called me stating that he Jeep needs new rockers and a cam shaft on the drivers side engine bank. FCA has known about this issue since 2012. I called FCA to see if they would provide any assistance to repair the Jeep. FCA refused to acknowledge that this issue exists and refuses any assistance for owners even slightly out of warranty even though it is a manufacturing defect.

NHTSA ID Number: 10950125

Incident Date August 15, 2016

Consumer Location BEATRICE, AL

Vehicle Identification Number 1C4BJWKGOGL****

Summary of Complaint

ENGINE TICKING ON LEFT SIDE. THIS SEEMS TO BE A COMMON PROBLEM WITH THE 3.6 PENSTAR ENGINE. I'VE TAKEN IT TO TWO DIFFERENT JEEP DEALERSHIPS AND BOTH OF THEM SAID PRETTY MUCH THAT THIS IS SOMETHING I'LL JUST HAVE TO DEAL WITH. THAT IS TOTALLY UNACCEPTABLE. THIS WAS OVER A 30 THOUSAND DOLLAR INVESTMENT. THIS JEEP DIDN'T HAVE THIS PROBLEM WHEN I PURCHASED IT OTHERWISE I WOULDN'THAVE BOUGHT IT. LOOKING TO THE NHTSA FOR A SOLUTION.

NHTSA ID Number: 11286619

Incident Date November 22, 2019

Consumer Location Unknown

Vehicle Identification Number 1C4BJWKG7GL****

Summary of Complaint

TL* THE CONTACT OWNS A 2016 JEEP WRANGLER. WHILE DRIVING 10 MPH, THE CONTACT HEARD AN ABNORMAL NOISE. THE CONTACT STATED THAT THE ABS WARNING INDICATOR WAS ILLUMINATED. THE VEHICLE WAS TAKEN TO WOODHOUSE CHRYSLER DODGE JEEP RAM FIAT (LOCATED AT 2101 6TH ST, SIOUX CITY, IA 51101, (712) 277-3221) WHERE IT WAS DIAGNOSED THAT THE RIGHT SIDE OF THE

INTAKE CAMSHAFT NEEDED TO BE REPLACED. THE VEHICLE WAS REPAIRED, BUT THE LEFT SIDE OF THE INTAKE CAMSHAFT ALSO NEEDED TO BE REPLACED. THE MANUFACTURER WAS INFORMED OF THE FAILURES. THE FAILURE MILEAGE WAS 130,000.

NHTSA ID Number: 11289490

Incident Date December 1, 2019

Consumer Location CHARLOTTE, NC

Vehicle Identification Number 1C4BJWEG2GL*****

Summary of Complaint

ENGINE CLICKING SOUND !!

NHTSA ID Number: 11289270

Incident Date November 23, 2019

Consumer Location MOORHEAD, IA

Vehicle Identification Number 1C4BJWKG7GL*****

Summary of Complaint

TL* THE CONTACT OWNS A 2016 JEEP WRANGLER. WHEN THE VEHICLE WAS STARTED, THE CONTACT HEARD AN ABNORMAL KNOCKING NOISE COMING FROM THE ENGINE. THE VEHICLE WAS TAKEN TO WOODHOUSE CHRYSLER DODGE JEEP RAM FIAT (2101 6TH ST, SIOUX CITY, IA 51101, (712) 277-3221) WHERE IT WAS DIAGNOSED THAT THERE WAS DAMAGE TO THE PASSENGER SIDE CAMSHAFT CAUSED BY ROCKER ARM FAILURE. THE VEHICLE WAS REPAIRED, BUT THE FAILURE RECURRED ON THE DRIVER'S SIDE CAMSHAFT AND ROCKER ARMS. THE MANUFACTURER WAS INFORMED OF THE FAILURES. THE APPROXIMATE FAILURE MILEAGE WAS 130,000. *JS

NHTSA ID Number: 11322372

Incident Date April 21, 2020

Consumer Location YADKINVILLE, NC

Vehicle Identification Number 1C4BJWKGXGL*****

Summary of Complaint

I REPLACED A SINGLE ROLLER ROCKER ON THE RIGHT SIDE OF THE ENGINE EARLY IN 2019. NOW I AM LOOKING AT A FAILED ROLLER ROCKER ON THE SAME SIDE OF THE ENGINE AND POTENTIALLY AN ENGINE REPLACEMENT.

NHTSA ID Number: 11297985

Incident Date January 1, 2020

Consumer Location ENTERPRISE, AL

Vehicle Identification Number 1C4BJWDG9JL****

Summary of Complaint

AUDIBLE TICKING COMING FROM ENGINE COMPARTMENT

NHTSA ID Number: 11331710

Incident Date June 29, 2020

Consumer Location KEANSBURG, NJ

Vehicle Identification Number 1C4GJXAG9LW****

Summary of Complaint

WITH LESS THAN 400 MILES ON THE VEHICLE, A TAPPING SOUND COULD BE HEARD FROM THE ENGINE BAY. WHEN IT WAS BROUGHT INTO THE DEALERSHIP FOR SERVICE, IT WAS DETERMINED THAT THERE WAS AN ISSUE WITH THE ENGINE. THE SERVICE TECHNICIAN STATED THERE WAS A CAMSHAFT ISSUE FOR A TAPPET THAT HAD FAILED AND WAS DELIVERED FROM THE FACTORY WITH THE DEFECT. THIS HAS RESULTED IN A REPLACEMENT OF THE ROCKERS, TAPPETS, AND INTAKE AND EXHAUST CAMSHAFTS.

NHTSA ID Number: 11325874

Incident Date September 8, 2019

Consumer Location DAVENPORT, FL

Vehicle Identification Number 2C3CCAFJ5EH****

Summary of Complaint

DRIVING THE CAR UNDER NORMAL LOAD,S TARTED TO NOTICE A KNOCK FROM THE ENGINE. OVER THE NEXT FEW WEEKS IT PROGRESSIVELY GOT WORSE. PULLED PLUGS, CHECKED OIL. GAS, PUT A BOROSCOPE DOWN THE SPARK PLUG HOLES LOOKING FOR ENGINE DAMAGE. FINALLY HAD TO HAVE THE CAR SENT TO THE SHOP. WHEN THEY GOT THE MOTOR TORN DOWN THE BAD LIFTER WAS DISCOVERED. UPON SEEING THAT & DOING SOME RESEARCH THERE ARE QUITE A FEW POSTS ON FORUMS ABOUT THE MDS LIFTERS ON THE 5.7 & 6.4 HEMIS GOING BAD & DESTROYING A CAM. I HAVE HAD OIL ANALYSIS DONE ON MOST OIL CHANGES THROUGH

OUT OWNER SHIP BUT THIS WASN'T PICKED UP ON FROM THE LAST ONE. NOT SURE IF IT WENT OUT QUICK & DESTROYED THE CAM OR IF IT HAD BEEN HAPPENING FOR A WHILE. CAR ONLY HAS AROUND 75000 MILES.

NHTSA ID Number: 10717078

Incident Date May 15, 2015

Consumer Location FORESTVILLE, MD

Vehicle Identification Number N/A

Summary of Complaint

THE VEHICLE'S ENGINE LIGHT CAME ON WHILE DRIVING. IT BEGAN TO LOOSE POWER, SHAKE, AND SPUTTER. IT FELT LIKE IT WAS GOING TO CUT OFF AT THE SPEED OF 43MPH. I TOOK IT TO THE DEALER ON 5/16/15, THEY INDICATED THAT THERE WAS A CODE THAT INDICATED THAT THERE WAS A MISFIRE AND THAT THEY HAD CLEARED IT. I DROVE THE CAR HOME AND THE ENGINE LIGHT CAME BACK ON AND THE PROBLEMS RESUMED. I RETURNED TO THE DEALERSHIP WHERE THEY INDICATED THAT THEY ASKED IF I WAS AWARE THAT THEY NEEDED TO "TAKE THE ENGINE A PART"? I STATED THAT THEY NEEDED TO DO WHAT WAS NECESSARY TO FIX MY VEHICLE. THE SERVICE REPRESENTATIVE ALSO INDICATED THAT MY VEHICLE WAS OUT OF WARRANTY BUT BECAUSE I PURCHASED AN EXTENDED WARRANTY I SHOULD BE COVERED. I AM UNCLEAR AS TO WHY I WOULD HAVE ENGINE PROBLEMS IN A VEHICLE AT 57K MILES, THIS SHOULD ALSO BE A POWER TRAIN ISSUE WHICH WOULD MEAN THAT MY VEHICLE SHOULD BE COVERED FOR 100K MILES. CURRENTLY I AM STILL WAITING ON THE DEALERSHIP TO CONTACT ME REGARDING THE STATUS OF MY VEHICLE HOWEVER I AM DISAPPOINTED THAT I AM HAVING THESE PROBLEMS AND HAVE BEEN WITHOUT TRANSPORTATION FOR THREE DAYS.

NHTSA ID Number: 11084935

Incident Date February 13, 2018

Consumer Location BECKLEY, WV

Vehicle Identification Number 2C4RC1BG7ER****

Summary of Complaint

TL* THE CONTACT OWNS A 2014 CHRYSLER TOWN AND COUNTRY. WHILE DRIVING VARIOUS SPEEDS, LOUD NOISES WERE HEARD

COMING FROM THE ENGINE COMPARTMENT. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE LIFTER IN THE ENGINE WAS FAULTY. THE DEALER (SHEETS CHRYSLER IN BECKLEY, WEST VIRGINIA) WAS MADE AWARE OF THE FAILURE AND STATED THAT THE VEHICLE WAS NOT INCLUDED IN A RECALL. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 133,000.

NHTSA ID Number: 11219321

Incident Date January 15, 2019

Consumer Location PIGEON, MI

Vehicle Identification Number 2C4RC1BGXER****

Summary of Complaint

ABOUT JANUARY 15, 2019 WE NOTICED A RATTLING SOUND COMING FROM THE ENGINE COMPARTMENT ON THE RIGHT OR PASSENGER SIDE. THE RATTLING WAS ONLY NOTICEABLE IF YOU WERE STANDING NEXT TO THE VAN WHEN IT WAS IDLING. THE RATTLING HAS GOTTEN WORSE SO WE TOOK IT INTO THE DEALER & FOUND OUT WE NEED TO REPLACE 4 CAMSHAFTS & 24 ROCKER ARMS TO FIX THE PROBLEM. THE MECHANIC TOLD ME THIS HAS BEEN A COMMON PROBLEM WITH THIS ENGINE. MOSTLY AFTER 120,000. MILES. OUR VAN ONLY HAS 94,855 MILES. STILL UNDER THE 100,000 MILE WARRANTY BUT 10 MONTHS PAST THE 5 YEAR WARRANTY. THE DEALER & CHRYSLER SCA TOLD ME THEY WON'T FIX IT UNDER WARRANTY. THIS SHOULD BE REPAIRED UNDER WARRANTY SINCE WE ARE UNDER THE 100,000. MILES. THE DEALER TOLD ME IF THERE WERE ENOUGH COMPLAINTS THAT MIGHT BE ENOUGH TO START A RECALL FOR THIS ISSUE. THERE IS DEFINITELY A MANUFACTURING DEFECT FOR THIS TO HAPPEN. TODAY'S ENGINES SHOULD RUN 500,000. MILES MINIMUM BEFORE HAVING TO DO MAJOR WORK TO THE ENGINE.

NHTSA ID Number: 11221357

Incident Date June 10, 2019

Consumer Location EDMOND, OK

Vehicle Identification Number 2C4RC1BGXER****

Summary of Complaint

INVOICE DATE 06/12/2019: VAN ON STARTUP LOUD TAPPING FROM THE ENGINE. AFTER TAKING TO THE DEALER, WAS TOLD A ROCKER ARM HAD FAILED AND DAMAGED THE INTAKE CAMSHAFT ON THE RIGHT/FRONT SIDE OF THE ENGINE. HAD TO HAVE ALL 12 ROCKER ARMS REPLACED (5184296AH), THE INTAKE CAMSHAFT (5184380AG), ALL 12 TAPPET VALVE LASH (5184332AA). WAS TOLD BY DEALER THIS WAS A COMMON PROBLEM WITH THESE V6 PENTASTAR ENGINES. AN ONLINE SEARCH REINFORCES THIS STATEMENT. TOTAL COST WAS \$1,356.54

NHTSA ID Number: 11281012

Incident Date November 12, 2019

Consumer Location Unknown

Vehicle Identification Number 2C4RC1HG3ER****

Summary of Complaint

TL* THE CONTACT OWNS A 2014 CHRYSLER TOWN AND COUNTRY. WHILE DRIVING 40 MPH, THE CHECK ENGINE WARNING INDICATOR ILLUMINATED. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHERE IT WAS DIAGNOSED THAT THE CAMSHAFT FAILED AND NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE VEHICLE WAS TAKEN TO NAPLETON'S ARLINGTON HEIGHTS CHRYSLER DODGE JEEP RAM (1155 W DUNDEE RD, ARLINGTON HEIGHTS, IL 60004) WHERE IT WAS DIAGNOSED THAT THE CAMSHAFT AND TIMING CHAIN NEEDED TO BE REPLACED. THE VEHICLE WAS NOT REPAIRED. THE MANUFACTURER WAS MADE AWARE OF THE FAILURE AND INFORMED THE CONTACT TO CALL NHTSA TO FILE A COMPLAINT. THE FAILURE MILEAGE WAS APPROXIMATELY 80,000.

NHTSA ID Number: 11282561

Incident Date November 22, 2019

Consumer Location RISING SUN, MD

Vehicle Identification Number 2C4RC1BG3ER****

Summary of Complaint

IWHEN I BOUGHT MY 2014 TOWN AND COUNTRY MINI VAN IT HAD 39111 MILES ON IT I BOUGHT AND EXTENDED WARRANTY WHICH WILL NOT COVER MY ENGINE PROBLEM SINCE IT WAS COVERED AT THE TIME BY THE MANUFACTURER, WELL AS YOU CAN IMAGINE 4

MONTHS PAST THE MANUFACTURER WARRANTY RAN OUT IT IS IN THE SHOP, WHICH IT NEEDS THE CAMSHAFT AND ROCKER ARMS REPLACED AND IT IS MISFIRING ON CYLINDER #6 I HAVE 94,000 MILES ON THE VAN SO THE 100,000 MILE PART THEY WILL NOT COVER FOR THEY SAY 60 MONTHS OR 100,000 MILES WHICH IS NOT RIGHT, I HAVE SEEN SEVERAL COMPLAINTS ABOUT THE CAMSHAFTS AND ROCKER ARMS GOING BAD AND BREAKING DOWN AS WELL AS MISFIRING CYLINDERS. WHEN WILL THERE BE A RECALL ON THESE PROBLEMS. THESE VEHICLES SHOULD LAST 100'S OF THOUSANDS OF MILES IF TAKEN CARE AS I HAVE TAKEN CARE OF MINE. I AM EXTREMELY DISAPPOINTED IN CHRYSLER AND I HONESTLY DON'T THE JOB IS BEING DONE TO INVESTIGATE THESE PROBLEMS. MY VAN IS CURRENTLY IN A SHOP WAITING TO SEE IF THE MANUFACTURER WILL HONOR THE WARRANTY SINCE IT IS ONLY FOUR MONTHS PAST THE 60 MONTHS FROM WHEN THE VAN WAS FIRST PUT INTO SERVICE BY SOMEONE ELSE BEFORE ME I BOUGHT IT USED FROM COOKS AUTO AND I THOUGHT THE EXTENDED WARRANTY WOULD COVER ANY ENGINE PROBLEMS BUT I WAS WRONG THEY CLAIM THAT SINCE IT HAD A MANUFACTURER WARRANTY THEY HAD TO GIVE ME A DIFFERENT WARRANTY PLAN AND DID NOT EXPLAIN, I WAS TOLD I WAS COVERED BUMPER TO BUMPER UNTIL I HIT 99,111 PLEASE INVESTIGATE AND DO A RECALL ON THESE ENGINES. THANK YOU.

NHTSA ID Number: 11318384

Incident Date August 12, 2019

Consumer Location SHEFFIELD LAKE, OH

Vehicle Identification Number 2C4RC1BG3ER****

Summary of Complaint

WHEN WE PURCHASED THE VAN IN 2018, THE DEALER TOLD US THE NUMBER 2 HEAD WAS REPLACED AND CAMSHAFT BECAUSE OF ROCKER ARM TICKING, NOW LAST FALL I HAD TO REPLACE 8 ROCKER ARMS ON THE SAME HEAD. CHRYSLER EXTENDED THE WARRANTIES ON 2011 THRU 2013, BUT THE 2014 HAS THE SAME EXACT ENGINE. WHY ISN'T IT COVERED UNDER THE EXTENDED WARRANTY, I NEED ANOTHER CAMSHAFT.

NHTSA ID Number: 11395567

Incident Date May 1, 2020

Consumer Location ADAMS, TN

Vehicle Identification Number 2C4RC1GGXER****

Summary of Complaint

MY VEHICLE HAS A TICKING PROBLEM (LIFTER) FOR OVER 8 MONTHS. I NEED TO GET IT FIXED AND NO ONE WORKS ON THE ENGINE. ONLY THE DEALER. SECONDLY, MY ENGINE LIGHT COMES ON FOR THE THERMOSTAT GAUGE.

NHTSA ID Number: 11103571

Incident Date June 18, 2018

Consumer Location NORTH CHARLESTON, SC

Vehicle Identification Number 2C4RC1BGXFR****

Summary of Complaint

119000 MILES ON WHILE DRIVING VEHICLE SERVICE LIGHT CAME ON. HAD PLUGS AND COIL REPLACE BECAUSE OF SKIPPING. PROBLEM STILL ON GOING HAD FUEL INJECTION DONE. STILL SKIPPING, MECHANIC SUGGEST GETTING HEADS REDONE. LIFTERS MAKING TICKING SOUND.

NHTSA ID Number: 11252886

Incident Date July 8, 2019

Consumer Location Unknown

Vehicle Identification Number N/A

Summary of Complaint

TL* THE CONTACT OWNS A 2016 CHRYSLER TOWN AND COUNTRY. THE CONTACT STATED THAT THE VEHICLE MADE AN ABNORMAL TICKING NOISE COMING FROM THE ENGINE COMPARTMENT. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC FOR AN OIL CHANGE, BUT THE TICKING NOISE CONTINUED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE AND VIN WERE UNKNOWN.

NHTSA ID Number: 11280313

Incident Date October 15, 2019

Consumer Location WATERLOO, NY

Vehicle Identification Number 2C4RC1BG4GR****

Summary of Complaint

TL* THE CONTACT OWNS A 2016 CHRYSLER TOWN AND COUNTRY. THE CONTACT NOTICED A TICKING NOISE COMING FROM THE ENGINE WHILE DRIVING. THE VEHICLE WAS TAKEN TO AN INDEPENDENT MECHANIC WHO DIAGNOSED A MISFIRE IN ENGINE CYLINDER NUMBER FIVE. THE VEHICLE WAS TOWED TO ANOTHER INDEPENDENT MECHANIC WHO DETERMINED THAT THE ROCKER ARM FAILED. THE MANUFACTURER ISSUED AN EXTENDED 150,000 MILE WARRANTY. THE CONTACT SPOKE WITH THE MANUFACTURER AND THEY COULD NOT FIND ANYTHING RELATED TO THE FAILURES FOUND BY THE INDEPENDENT MECHANICS. THE DEALER WAS NOT CONTACTED AND THE VEHICLE WAS NOT REPAIRED. THE FAILURE MILEAGE WAS 100,300.

NHTSA ID Number: 11309854

Incident Date October 1, 2019

Consumer Location DUNDALK, MD

Vehicle Identification Number 2C4RC1BG3GR****

Summary of Complaint

TL* THE CONTACT OWNS A 2016 CHRYSLER TOWN AND COUNTRY. THE CONTACT STATED THAT WHILE DRIVING AT UNDISCLOSED SPEEDS, A KNOCKING SOUND WAS EMITTED FROM THE ENGINE. UPON INSPECTION IT WAS DISCOVERED THAT THE ENGINE CAMSHAFT ROCKER ARM WAS DEFECTIVE AND NEEDED TO BE REPAIRED. THE VEHICLE WAS NOT REPAIRED. CAUSE OF THE FAILURE WAS NOT DETERMINED. THE MANUFACTURER WAS NOTIFIED OF THE FAILURE BUT NO ASSISTANCE WAS OFFERED. THE LOCAL DEALER WAS NOT NOTIFIED. THE FAILURE MILEAGE WAS 60,000.

NHTSA ID Number: 11339073

Incident Date July 1, 2020

Consumer Location STERLING HEIGHTS, MI

Vehicle Identification Number 2C4RC1BG0GR****

Summary of Complaint

I LOVE THE TOWN AND COUNTRY VAN, AND THIS IS MY 3TH CAR - MY 2016, I HAVE THIS CAR SINCE NEW, RIGHT NOW IT HAS 80,000 MILES AND 2 WEEKS AGO IT STARTED WITH A LIGHT TICKING NOISE IN THE ENGINE (WHEN ENGINE IS ON IN PARK OR DRIVING), AND

NOW IT IS GETTING WORSE OVER THE WEEK - I TOOK MY CAR TO DEALER AND THE COST WILL BE AROUND \$1000 USD - DEALER MENTIONED THAT THIS IS A KNOWN ISSUE FROM THE MANUFACTURER AND TOO MANY CARS AFFECTED, AND IT BECUSE ON ENGINE PENTASTAR WITH 3.6LTS THE CAMSHAFT HAS A LOOSE ROLLER BALANCING (ORIGINAL PART#: 0518.4296 AH008) WHICH IS DOING THE NOISE - THE PART PRICE IS A COUPLE DOLLAR, BUT THE LABOR IT IS EXPENSIVE) - I NEED YOUR SUPPORT TO FIX THIS ISSUE ON MY CAR

NHTSA ID Number: 11377198

Incident Date August 31, 2020

Consumer Location POCATELLO, ID

Vehicle Identification Number 2C4RC1BG5GR****

Summary of Complaint

ENGINE TICKING/KNOCKING STARTED AT ABOUT 70,000 MILES, AUGUST 2020. IT APPEARS TO BE THE ROCKER ARMS. WE HAVE BEEN EXPERIENCING LOSS OF POWER PERIODICALLY. IT TICKS WHEN IDLING AND SPEEDS UP AS ENGINE IS REVVED OR ACCELERATING. BECOMES LOUDER AFTER BEING DRIVEN AT HIGHWAY SPEEDS AND FOR LONGER DRIVES OVER 20 MINS.

NHTSA ID Number: 11395070

Incident Date November 15, 2019

Consumer Location DAYTON, OH

Vehicle Identification Number 2C4RC1BG2GR****

Summary of Complaint

A TAPPING SOUND FROM MY ENGINE. APPEARS MANY OWNERS OF THIS VEHICLE TYPE AND ENGINE FOR THE 2016 ARE HAVING THE SAME PROBLEM. WHEN WILL A RECALL BE DEMANDED?

NHTSA ID Number: 11310289

Incident Date February 18, 2020

Consumer Location Unknown

Vehicle Identification Number N/A

Summary of Complaint

TL* THE CONTACT OWNS A 2020 CHRYSLER PACIFICA. THE CONTACT STATED THAT THE VEHICLE EXPERIENCED AN CONTROL ACCELERATION FOR 20 SECOND, THE CHECK ENGINE WARNING LIGHT ILLUMINATED, THE BRAKE PEDAL WAS LOSING THE ABILITY TO HOLD THE VEHICLE, THE ENGINE RAV UP TO 7000 RPM AND THERE WAS A TICKING NOISE COMING FROM THE ENGINE AFTER THE VEHICLE COOL DOWN. THE VEHICLE WAS RESTARTED AND WAS DRIVING TO CHAMPAIGN CHRYSLER DODGE JEEP RAM DEALER, (1906 MORELAND BLVD, CHAMPAIGN, IL 61822) BUT WAS NOT DIAGNOSED NOR REPAIRED. THE MANUFACTURER WAS NOT MADE AWARE OF THE FAILURE. THE FAILURE MILEAGE WAS APPROXIMATELY 200. THE VIN WAS NOT AVAILABLE.

NHTSA ID Number: 11416164

Incident Date May 8, 2021

Consumer Location ROCKVILLE, MD

Vehicle Identification Number 2C4RC1L72MR****

Summary of Complaint

AFTER 2 WEEKS AND LESS THAN 150 MILES, THE ENGINE MISFIRED DURING A SHORT DRIVE TO THE GROCERY STORE. THE DEALER STATES THAT A BEARING IN A LIFTER SEIZED.

NHTSA ID Number: 11183513

Incident Date February 4, 2019

Consumer Location SPRINGFIELD, VA

Vehicle Identification Number 1C4RJFBG5EC****

Summary of Complaint

2014 JGC WITH PENTASTAR 3.6L V6 GAS ENGINE STARTED MAKING A TICKING SOUND AT START UP APPROXIMATELY 3 WEEKS AGO. THE SOUND DID NOT DIMINISH AFTER WARM UP. DIAGNOSED TODAY AS A FAILED LIFTER AND POSSIBLE CAM DAMAGE AS WELL. INQUIRED OF THE DEALER ABOUT TSB 09-002-14 AND WAS TOLD THIS ISSUE WAS LIMITED TO ONLY 2011-2013 MODEL YEARS AND THAT THE ENGINE IN MY VEHICLE WAS MADE AFTER THE DATE OF THE AFFECTED ENGINES AND WAS NOT INCLUDED IN THE REPAIR/WARRANTY BEING OFFERED BY FCA REGARDING THE ENGINE. THE VEHICLE WAS MANUFACTURED IN JUNE 2013 AND PURCHASES IN SEPTEMBER 2013.

NHTSA ID Number: 11203281

Incident Date April 15, 2019

Consumer Location SLAYTON, MN

Vehicle Identification Number 1C4RJFBG2EC****

Summary of Complaint

LIFTERS COLLAPSED INTO THE ENGINE AT 145K MILES REQUIRING INSTALLATION OF NEW ENGINE. VEHICLE WAS LESS THAN 5 YEARS OLD. AT 2 YEARS OF AGE VEHICLE WAS MAKING KNOCKING NOISES AND THE CHECK ENGINE LIGHT WAS ON. WE BROUGHT IT IN FOR REPAIRS MULTIPLE TIMES REPLACING ALL LIFTERS, ROCKERS, CAM SHAFT AND CATALYTIC CONVERTERS ALL AT OUR EXPENSE. EACH TIME THE CHECK ENGINE LIGHT CAME BACK ON IN LESS THAN 2 WEEKS AND THE KNOCKING CONTINUED. AFTER SPENDING ALL OF THIS MONEY THE END RESULT IS HAVING TO SPEND MORE ON THE NEW ENGINE.

NHTSA ID Number: 11278313

Incident Date November 4, 2019

Consumer Location TRAVERSE CITY, MI

Vehicle Identification Number 1C4RJFCT2EC****

Summary of Complaint

CAMSHAFT AND LIFTER PROBLEM. CAMSHAFT HAD TO BE REPLACED DUE TO LIFTER NOT OPERATING PROPERLY AND WEARING OUT CAMSHAFT.

NHTSA ID Number: 11300227

Incident Date November 21, 2019

Consumer Location MORGANTOWN, WV

Vehicle Identification Number 1C4RJFCG4EC****

Summary of Complaint

ABOUT TWO MONTHS AGO MY SUSPENSION STARTED TO ACT UP. NOW MY SUSPENSION IS STUCK COMPLETELY AT THE LOWEST POINT. THE ENGINE HAS A TICKING SOUND AND NOW IT DOESNT RUN RIGHT.

NHTSA ID Number: 11330272

Incident Date July 7, 2019

Consumer Location BAYAMON, PR

Vehicle Identification Number 1C4RJEBGXEC*****

Summary of Complaint

ROCKER ARM ISSUE ON THE 3.6L ENGINE SEEM TO BE A FABRICATION PROBLEM THAT THE COMPANY WILL ONLY FIX IF ONE OF THOSE BRAKE DURING THE WARRANTY. AFTER THAT YOU'RE ON TOUR OWN. IT IS UNFAIR THAT THE COMPANY KNOWING THAT THE ENGINE HAVE AN ISSUE WILL NOT RECALL IT AND HAVE IT FIX. THE BEARING FAILS AND THE ENGINE START MAKING A KNOCKING SOUND CREATING ALL SORT OF FAILING CODES ON THE PCM. *TR

NHTSA ID Number: 11423877

Incident Date May 20, 2021

Consumer Location SAN ANTONIO, TX

Vehicle Identification Number 1C4RJFBG0EC*****

Summary of Complaint

My jeep has developed the 3.6L Penastar tick. I noticed FCA extended the warranties for vehicles equipped with the 3.6L Penastar V6 but for my model they stopped in 2013. How can I get my year added to that warranty since it developed the same problems as the previous years. We had our jeep at a local dealer in Wasilla Ak for a tune up before our long trip and he didn't mention anything to us even though the tick was noticeable. I then had my vehicle state safety inspection completed (Texas) in 1st week of June and the mechanic told me about it and after some research, my jeep has the same tick coming from the engine.

NHTSA ID Number: 11278795

Incident Date October 30, 2019

Consumer Location TOULON, IL

Vehicle Identification Number 1C4RJFCG3FC*****

Summary of Complaint

MEMORY SEATS NO LONGER WORK, THEREFORE CAUSING MY SEAT TO BE OUT OF WHACK AND I CAN NOT SIT RIGHT. MY ENGINE BEGAN TO MAKE A TICKING NOISE OUT OF NOWHERE, MEANING SOMETHING IS WRONG. ONE HEADLIGHT IS OUT BUT ISN'T AND CAUSES MY BRIGHT TO BE ON AT ALL TIMES. WHEN USING MY LIGHT I NOW CANNOT USE MY ACTUAL BRIGHTS. *PM

NHTSA ID Number: 11310371

Incident Date February 14, 2020

Consumer Location WEST HAVEN, CT

Vehicle Identification Number 1C4RJFBG8FC****

Summary of Complaint

THE VEHICLE ENGINE HAD A CLICKING/TICKING NOISE FOR WELL OVER A YEAR. WE BROUGHT THIS ISSUE UP WITH THE SERVICE DEPT AND WERE TOLD IT WAS NOTHING TO WORRY ABOUT. WHILE DRIVING HOME 1 NIGHT ON THE HIGHWAY THE VEHICLE STARTED TO HESITATE/STUTTER AND WE HAD A PROBLEM ACCELERATING WHILE DRIVING. WE DROVE THE VEHICLE FOR 20 MILES AT 40 MPH WITH THE HAZARDS ON I95. WE FOUND OUT FROM SERVICE THE NEXT DAY THAT THE ISSUE WAS A DAMAGED CAMSHAFT DUE TO A FAILED ROCKER ARM. ALL ROCKERS AND LIFTERS NEEDED TO BE REPLACED ALONG WITH THE VALVE COVER GASKETS AND INTAKE SEALS. SINCE THE ISSUE OCCURED OUT OF WARRANTY I WAS STUCK WITH FOOTING THE WHOLE 1961.49 BILL EVEN THOUGH I BROUGHT THE ISSUE UP WITH SERVICE WHILE UNDER WARRANTY.

NHTSA ID Number: 11315903

Incident Date January 14, 2020

Consumer Location CLEVELAND, OH

Vehicle Identification Number 1C4RJFAG7FC****

Summary of Complaint

HEARD TICKING COMING FROM ENGINE SHORTLY AFTER ROUTINE OIL CHANGE. BROUGHT THE CAR IN, AND WAS TOLD I HAD TO HAVE INTAKE & EXHAUST CAMSHAFT & LIFTERS REPLACED. HAD REPAIRED, A WEEK LATER CHECK ENGINE LIGHT CAME ON. GOT A P0456 CODE, BROUGHT IT IN AND AT THIS POINT THEY SAID I NEEDED TO REPLACE EVAPORATIVE PURGE VALVE. DID THAT, A WEEK LATER, CHECK ENGINE LIGHT IS ON AGAIN. NOTHING CHANGED IN THE CAR WHEN THE LIGHT GOES ON, IT JUST COME ON AND STAYS A SOLID YELLOW UPON STARTUP

NHTSA ID Number: 11413011

Incident Date April 1, 2020

Consumer Location BALDWINVILLE, NY
Vehicle Identification Number 1C4RJFBG4FC****
Summary of Complaint
ENGINE IS MAKING A LOUD TICKING NOISE.

NHTSA ID Number: 11425464
Incident Date July 15, 2021
Consumer Location FLEMINGTON, NJ
Vehicle Identification Number 1C4RJFBG6FC****
Summary of Complaint
Engine Rocker Arms bad. Engine stalls and vehicle undrivable. 96K miles

NHTSA ID Number: 11429739
Incident Date February 12, 2021
Consumer Location ROXBORO, NC
Vehicle Identification Number 1C4RJFBG9FC****
Summary of Complaint
The contact owns a 2015 Jeep Grand Cherokee. The contact stated that she heard a loud vibrating noise coming from the engine compartment while driving at various speeds. The contact stated that the check engine warning light was illuminated. The vehicle was diagnosed with needing the camshaft arms and gaskets replaced however, the vehicle was not repaired. The manufacturer was informed of the failure and referred the contact to the NHTSA for assistance. The failure mileage was approximately 75,000. Consumer was informed by the mechanic 3.6 liter engine in this vehicle is experiencing a common problem in this make /model.

NHTSA ID Number: 11382705
Incident Date October 22, 2020
Consumer Location WEST PALM BEACH, FL
Vehicle Identification Number 1C4RJECEG5LC****
Summary of Complaint
2020 JEEP GRAND CHEROKEE OVERLAND. CONSUMER WRITES IN REGARDS TO ENGINE TROUBLE. *LD THE CONSUMER STATED THE ENGINE FAILED WHILE DRIVING. THE DEALER AND MANUFACTURER WERE NOTIFIED. *JS

EXHIBIT 2

2014-2016 Chrysler Town & Country

Ticking from engine - Read me if yours is ticking too

□

With that said, at last oil change, I noted a "ticking" coming from our 2015. It sounded like it was coming from around the trans area. I had also noted that the trans pan was leaking. So a little coordination with the Wife (it is her van), we got it into the local Chrysler dealer (St. Charles CDJ for anyone in the Chicago area).

They diagnosed it. It had NOTHING to do with the transmission. It was the valvetrain on the engine...

Exact verbage from the service ticket;

Repair Engine service per previous diag on RO 206154. Engine ticking- previously diagnosed lifter/rocker noise. Disassembled valve covers and inspected. Found left exhaust cam and right cam intake cams have ground down lobes. Inspected all cams and found four camshaft wear spots. Rockers/rollers on rockers dropped causing cams to grinds. Replaced all lifters, rockers, and all cams. Reassembled and retested. Noise is gone.

Here is the parts list;

1 - 5184379-AF Camshaft
1 - 5184377-AF Camshaft
1 - 5184380-AF Camshaft
1 - 5184378-AF Camshaft
24 - 5184332-AA Tappet
24 - 5184296-AH Arm Valve
6 - 5184331-AC Gasket Intake
6 - 5184562-AC Gasket Intake
1 - 5184595-AE Gasket CY
1 - 5184596-AE Gasket CY¹

2015 ticking noise coming from engine

My 2015 3.6 with 73,200 miles has developed a ticking noise from the engine. You can hear it standing in front of the vehicle with the hood open or closed. Its going on about a month now since I first heard it.

¹ Available at <https://www.chryslerminivan.net/threads/ticking-from-engine-read-me-if-yours-is-ticking-too.153729/?id=153729>

We first thought it just needed a good tank of high premium gas but after running an entire tank through...the ticking is still there. My dad who use to be a mechanic (he also lives in TN) said it sounds like the lifters to him but without the van being there for him to physically hear, he can't be 100% for sure. He suggested I try an engine treatment to see if that would help. I'm on day 2 of that so unsure if it will resolve the problem or not...jury is still out.

any searches about ticking noises seem to come up with a lot of problems with Chrysler & Dodge vehicles.²

2014-2020 Dodge Challenger

Lifter Noise On Start And While Driving

So I've had my new-to-me 2014 Challenger R/T for about a month now. So far, I've been really enjoying the car EXCEPT for one thing:

Every once in a while on a cold start, the car will make a hellacious lifter noise that sounds absolutely terrible. It's loud and unmistakable. My Dad heard it one time and instantly said, "That's not good." That's my sentiment as well. After about 30 seconds or so it quiets down, but it never goes away entirely. When taking off from a stop, I can still hear the slight lifter tapping....and this is over my Borla ATAK exhaust.

The car has 32k miles on it. The dealership I work for, and from whom I bought the car, had it taken to the Dodge dealer down the street for the same loud tapping issue apparently. According to the CarFax, Dodge replaced the camshaft and lifters at that time. After getting the car back, one of the porters noticed it was still making a ticking sound. We sent it back to Dodge and they returned it to us saying all was normal. Now, less than 1k miles later, I am hearing this noise.

- The Black Beast (November 4, 2015)³

2014-2020 Dodge Charger

2015 Charger 3.6 V6 Pentastar knocking and ticking issue

I very recently bought a new 2015 Charger with the V6 Pentastar in it. At about 200 miles, I noticed a pretty audible tick coming from the engine compartment when I accelerate at lower speeds. It does it all the time, I think, but you can't hear it at highway

² Available at <https://www.chryslerminivan.net/threads/2015-ticking-noise-coming-from-engine.170139/>

³ Available at <https://www.challengertalk.com/threads/lifter-noise-on-start-and-while-driving.432161/>

speeds.

More recently, it started knocking as well. It usually does the knocking thing after I come off of the highway. The car currently has 3000 miles on it, approx.

I took it to the Dodge dealer I bought it from in Lebanon, TN. They told me the ticking is "normal" or "operating as designed." Before I take it to another dealer, I thought I'd get inputs here.

Please watch the YouTube video to see what I'm talking about, as far as the knocking. You can skip to the 1:20 mark if you want. <https://www.youtube.com/watch?v=08N5U4y3dak>

- NashvilleCharger (02/21/2016)⁴

Ticking noise even after replacing lifters and cam

Need help! I have a 2013 Dodge Charger srt8 6.4l I just Replaced my lifters and cam and my engine is still ticking loud. It all started with a quiet ticking noise and it eventually kept getting louder so I pulled my engine apart and found 2 bad lifters, rollers had lots of play and were able to move up and down, I replaced my lifters and cam with a mds delete kit from AMS racing, engine is running great but it's still ticking and it's the loudest after my engine warms up, I'm not sure if this ticking noise was there before with the bad lifters ticking at that time but it sounds the same as it did before I replaced my lifters, I can't seem to figure it out, I talked to a few mechanics and they were unable to diagnose the ticking noise, if anyone could help me figure this out it would be much appreciated. Thanks

- 392hemidude (10/19/2020)⁵

2014-2020 Dodge Durango

Durango Limited 3:6, Automatic transmission, 14,200 miles

I bought a Durango 2016 in 2017 on Miami Lakes Auto Mall. At 2000 miles the motor 3.6 pentastar started making a noise like that of an old motor. I took the car to the dealer to the car and the camshaft, Gear camshaft, and phaser were replaced. The lift and rocker arm of the right side of the engine were also replaced. Since then the noise got better but is still there. I have taken it back to the dealer several times and mechanics cannot find

⁴ Available at <https://www.chargerforums.com/threads/2015-charger-3-6-v6-pentastar-knocking-and-ticking-issue.312081/>

⁵ Available at <https://www.chargerforumz.com/threads/ticking-noise-even-after-replacing-lifters-and-cam.198033/>

any problem, they said it is a normal sound. I took to another dealer and the mechanics said the same thing. They gave me a rental with the same motor 3.6 pentastar and the motor didn't make the sound my car was making. I told the mechanics that how come it was the same motor and didn't sound the same. Every time I drive it I hear that noise as if it was a lifter or rocker arm sound. I feel frustrated because the car is new and under warranty. I cannot make sense that a new car would have this sound.

- Yausel V. (10/09/2017)⁶

2017 3.6 Pentastar ticking

We bought a 17 Durango in January. 2300 miles on it and there is a ticking sound coming from the engine which has been getting louder. Start-up, idle and also increases in sound and speed with rpms. Have read on this motor having lifter and head issues in the past

but thought that may have changed with the newer version of the motor coming out. Is anyone else experiencing this problem? Our car is at the dealership currently (two weeks now). I'll update with what we are told the problem was.

- Bradshaw_17 (05/16/2017)⁷

Pentastar Ticking Noise Post Head Replacment

The cylinder head on our 2012 Durango with the Pentastar V6 was replaced in December 2016. The only indication that the cylinder head needed to be replaced was the check engine light. Following the head being replaced a ticking noise developed. It's my wife's car so I don't exactly how long after the noise developed but she informed me about mid January 2017 which was about a month after and she did indicate it had been making the ticking noise for at least a couple of weeks before that. I brought it in to the dealer that did the work and they stated it nothing to do with the the replacement of the head and it was lifters. They stated the lifters are not replaced when they do the head and that the current lifters are bad and they just wear out. So they replaced the lifters. The dealer dropped the car off at our home since we weren't home and when we first started it up there was no improvement and the ticking noise was exactly the same. I've searched forums and can not find a similar situation since most cases of ticking noise and cylinder head replacement seemed to take care of the issue. Any suggestions?

- Ralu81 (03/21/2017)⁸

⁶ Available at

https://www.carcomplaints.com/Dodge/Durango/2016/engine/ticking_noise_from_engine.shtml

⁷ Available at <https://dodgeforum.com/forum/3rd-gen-durango/403689-2017-3-6-pentastar-ticking.html>

⁸ Available at <https://www.allpar.com/threads/pentastar-ticking-noise-post-head-replacment.167213/>

2014-2020 Dodge Grand Caravan

2016 Grand Caravan lifter tick

My 2016 Grand Caravan, 109k miles, 3.6 engine, is experiencing lifter tick. I've owned the vehicle since 28k miles. Oil changes were synthetic oil changed per OLM; which tripped around 10k miles. I've read that earlier iterations of the 3.6 had lifter issues but this was supposed to have been rectified by redesigned heads. Dealership cost is going to be around \$1000 whether I replace one lifter or all (mostly labor). It has a fresh oil change and I am running Seafoam. Is this a common problem with these engines? Is the Seafoam likely to help? Can I let the problem go and replace later if the problem persists? My next oil change I will add Liquimoly Lifter Additive.

- Otis24 (07/15/2020)⁹

WHAT STOPPED THE LIFTER NOISE 2011 DODGE GRAND CARAVAN

Over a year ago, I had to get one of the heads opened in order to replace #3 and #5 rocker arms. Well about 6 months ago, I started having the ticking noise again. I put up with it for a month or so,

I found a video on Youtube that was talking about using Marvel Mystery Oil and although I have added it oil before in small amounts, I had never used as much as a quart. Mostly, I put it in the fuel tank. This time instead of using 6 quarts of synthetic oil, I used 5 quarts and used 1 quart of Marvel Mystery Oil. After about 3 days the noise stopped and has not come back for over 3 months. Every oil change I started to do the same thing. At first I was using 5w30 and the last time to 5w20 but, I think i will go back to 5w30 because the Mystery Oil is real thin. BTW it smells really good also..

- TaxiGirl (10/15/2016)¹⁰

2014-2015 Jeep Grand Cherokee

Ticking sound 2015 limited 3.6L

I have a 2015 grand Cherokee limited with 87000 miles, and 3.6l. I have recently noticed a "ticking" sound coming from right side of engine that appears after engine is warmed

⁹ Available at <https://bobistheoilguy.com/forums/threads/2016-grand-caravan-lifter-tick.329675/>

¹⁰ Available at <https://www.allpar.com/threads/what-stopped-the-lifter-noise-2011-dodge-grand-caravan.166041/>

up, It "ticks" faster when accelerating. It is not noticeable inside of car, also comes and goes. I have checked oil level and all is good there. any ideas welcome.

- Gpff214 (12/16/2020)


I regret to say that I've had that same noise twice (at 70K and at 90K) With my GC. I have a 2014 GC Ltd. with 97K and a V-6. I have fanatically maintained the GC since new, and except for the failing rocker arm, the Jeep has been trouble free. The "ticking" noises is likely a failing rocker arm, (which left unattended will damage the cam). It's an expensive fix, but in my case an extended warranty saved the day (plus the dealer warrants all engine work for two years.).

I would have the dealer check out the Jeep immediately. After the diagnosis, hopefully it will be covered under warranty. If not, talk it over with dealer and the FCA area manager for recourse under goodwill.

I LOVE my GC, but I am seriously considering buying an MDX for my next car, despite my strong preference for a Grand Cherokee.

Like a wife or a girlfriend that cheated on you, you may well still love her, but you'll never trust her.

- Alaskanjim (12/16/2020)

Well took it to the shop yesterday and got the news...  Will be getting a new engine due to bad rocker arms and they also found metal shavings in crankcase. Good news is the extended warranty is covering everything.

- Gff214 (12/19/2020)¹¹

2014 Grand Cherokee Rocker Arms/Cam Shaft Issue

Help! My 2014 Grand Cherokee had a ticking sound...took to dealership and the rocker arms and cam shaft need replacing to the tune of almost \$3,000. I have taken care of this vehicle in every way and it looks like new! All maintenance on time or even early. Can anyone tell me how to get Jeep to help with this? I talked with Customer Service and they said they can't do anything because it's over 24,000 miles.

- AJZ (09/24/2020)¹²

¹¹ Available at <https://www.jeepgarage.org/threads/ticking-sound-2015-limited-3-6l.228060/>

¹² Available at <https://www.jeepcherokeeclub.com/threads/2014-grand-cherokee-rocker-arms-cam-shaft-issue.244291/>

Thank you Jeep Forum! Rocker Arm Failure

Thanks to this forum, I knew that the ticking noise that I was hearing in my 2015 Jeep Cherokee was a failed bearing damaging the camshaft. Took it to the shop and they gave me the following, very common diagnosis:

"Check ticking noise from top side of engine. Noise is from valve train. Remove valve covers for inspection. Right intake camshaft has broken rocker arm and has worn lobe of camshaft on cylinder number 1. Replace all rocker arms and right intake camshaft with updated parts from dealer. (Chrysler / Jeep has updated those rocker arms 8 times since my Jeep came out due to this issue of the bearings disintegrating and damaging the camshaft).

I was lucky to have a local seasoned mechanic listen to my concerns and he was able to call in a mechanic from Chrysler to assist with the repair. It is my only vehicle but has 213,000 highway miles and I know Chrysler won't help me on this. My late-significant other picked this Jeep out for me so that I would be safe traveling long distances for work alone. He had me purchase this 4 months before he passed away and, other than an issue with the transmission clunking due to a software update, a new battery and new shocks, this Jeep has served me well. I hope that after this \$1,200 repair, I am able to put at least another 100,000 miles on it. I don't drive it hard and haven't even had to put breaks on it yet. I get regular oil changes and keep up the maintenance.

The mechanic told me this is a very very common issue on this engine so if you start to hear a ticking sound, get it in. I'm disappointed this hasn't been a recall since Jeep knows about the issue with the rocker arms but I paid the repair bill and hope this helps someone else.

I have pictures of the damaged parts if anyone would like to see what happens.

- Karabryan (04/28/2020)¹³

2014-2020 Chrysler 300

Tapping noise in Chrysler 300 3.5 V6 engine

My recently purchased Chrysler 300 Touring (40,000 miles) has a tapping noise in the upper engine when it reaches operating temperature. The noise can't be heard in the car, but is clear when standing outside. The car has been examined by two separate Chrysler dealers (neither aware of the other) and both say it's fuel injector noise and normal for this engine. It still sounds very much to me like a noisy lifter. I'm trying to find others

¹³ Available at <https://www.jeepforum.com/forum/f428/thank-you-jeep-forum-rocker-arm-failure-4395441/>

with the same car/engine to see if this is REALLY a normal thing or a problem unique to mine. Any thoughts or experience from those out there more familiar with Chrysler products than I am?

- Captlarry (06/14/2011)¹⁴

2018 Chrysler 300 3.6 v6 awd ticking sound engine

I got this Chrysler in January used,, was quite as a mouse,,as spring got here and got warmer I noticed a tick at first startup,, then I've noticed a ticking when I accelerate,, or slow down for a stop sign or light,, I've gone to 3 Chrysler service departments and no one can hear the sound,,, said all tests look normal,, also at a stop sign or light stopped it seems to miss or idle rough,,, no one can see a misfire on the computer,,, what is this car doing?? I'm thinking bad rocker arm,, any ideas?

- Robby Dodge (07/19/2019)¹⁵

2014-2020 Jeep Wrangler

The dreaded pentastar tick...

I got the tick on my '14 a few weeks ago and recognized it right away as lifter tick even before researching the issues with the pentastars and jeeps. I knew it wouldn't blow up immediately so I waited until the wife and I were able to get it in. We are the second owner and it turns out the origins owner purchased it July 16th of 2014 and we are out of the Powertrain warranty by two weeks which sucks. Quote for replacement of all lifters and rockers was \$1300.

I'm not against paying it, but one of my biggest concerns is that the cam got some strange wear and I'm paying this money now just to have more rocker or cam issues in the near future.

Anybody done the rocker and lifter repair and can give some feedback on how the repair shed? Should I plan on lifters and rockers every 60K miles or so? Should I ask them to replace the cam at the same time?

- Gagnonc1029 (08/01/2019)¹⁶

¹⁴ Available at <https://www.chryslerforum.com/forum/chrysler-300-300c-300c-srt-8-17/tapping-noise-chrysler-300-3-5-v6-engine-14954/>

¹⁵ Available at <https://www.300cforumz.com/threads/2018-chrysler-300-3-6-v6-awd-ticking-sound-engine.100813/>

¹⁶ Available at <https://www.wranglerforum.com/threads/the-dreaded-pentastar-tick.2371453/>

Engine TICKING again

First Engine lasted about 40K miles before ticking was loud enough for the dealer to inspect. Dealer was great in getting the whole engine replaced as there was metal everywhere in the engine. It did take almost a month for replacement but did get it back in time to make our ski trip.. it was the last week Colorado ski resorts were still open to public. Engine ran great had O2 sensor issue but was able to reset and was good to go.

I now have 3500 miles on the NEW Engine and 2k was from ski trip. It has started ticking and getting louder! I know the previous generation of 3.6 had valve train issues what are the chances of two engines having bad cam/lifter issues.

Dealer said a Chrysler employee would have to inspect it again, but warned me having the aftermarket bumper/Winch and Rockslide engineering sliders they could void warranty. [@JeepCares](#) is this possible to void my warranty with aftermarket bumper and sliders???

Has anyone had a problem with warranty work voided with bumper slider or tire upgrade?

- Thecritter (04/13/2020)¹⁷

2014-2020 Ram 1500

Why are my rocker arms so loose?

Just finished putting back together my ram 1500 just replaced cam/lifters, pushrods, cylinder heads and respectable components. Basically everything on upper half of engine other than rocker arms. Now while engine is running I noticed that there is an inconsistent ticking noise coming from cylinder heads, took off valve covers and 3 of 4 intake rockers are crazy loose and have an unacceptable amount of play on the side I took off. Positive it is not cam or lifters as I just replaced as well as valve seats or springs because they are also new (confirmed by cranking engine and getting full open and close on all 8 valves). Checked pushrods were not bent before installing. Torqued all 5 rocker arm bolts to the proper spec when putting it all back together. Couldn't find any info on this issue after searching the internet to the best of my ability. Coming here because I am officially stumped

- Gabe Paterson (08/10/2020)¹⁸

¹⁷ Available at <https://www.jlwranglerforums.com/forum/threads/engine-ticking-again.49436/>

¹⁸ Available at <https://www.ramforum.com/threads/why-are-my-rocker-arms-so-loose.165589/>

Hemi tick turned to a bad lifter,,,they think

So a little over a week ago, I took my truck into the dealer to have them listen to my engine. It seemed like over night i developed a lifter or valve problem. They agreed, and said I should not drive it. Waited on parts,,then waited on an available engine tech. Called me today said they got it back together and the noise is still there. I asked if i could listen to it, sure enough, same noise. Its coming from the driver side cylinder bank. They replaced all the lifters on that side. SOOOO,,truck still there and they will take it apart again. Any ideas??. I was thinking flat cam lobe, but i would think they would check that. Bent valve?? Bent rocker arm?? I dont know. I dont drive it hard at all, change my oil at the proper intervals. It has 44K on it.

- Glennwall3 (03/18/2013)¹⁹

2016- 2020 Chrysler Pacifica models

chrysler techs help...06 pacifica lifter ticking noise

i have an 06 pacifica 3.5L with 50K miles that has a persistant lifter tick noise. the noise follows the eng rpm. all lifters have been replaced but the noise is still there any ideas what it could be. local dealer is clueless. they said maybe it is supposed to tick a little. i

told them it didnt do it the first 45K miles why now and they went

thanks shane

- 70rrclone (03/24/2009)²⁰

3.5L HO Rocker Arm Tick - What causes it and the fix

In the 3.5L engine over time there can develop a rocker arm tick. Its usually noticed when the car starts up. For some it may go away after a few minutes of driving. over time however, it will last longer and longer and sometimes may come back while driving here and there. The tick is caused by a rocker dowel pin SHEARING, yes shearing off.

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- Samoan Tsunami (02/25/2012)²¹

¹⁹ Available at <https://www.ramforumz.com/threads/hemi-tick-turned-to-a-bad-lifter-they-think.136663/>

²⁰ Available at <https://board.moparts.org/ubbthreads/ubbthreads.php/topics/264447/chrysler-techs-help-06-pacifica-lifter-ticking-noise.html>

²¹ Available at <https://www.chargerforums.com/threads/3-5l-ho-rocker-arm-tick-what-causes-it-and-the-fix.152670/>